

John G. Balestriere\*  
Matthew W. Schmidt (Cal. Bar No. 302776)  
**BALESTRIERE FARIELLO**  
225 Broadway, 29th Floor  
New York, New York 10007  
Telephone: (415) 966-2656  
Facsimile: (212) 208-2613  
john.balestriere@balestrierefariello.com  
matthew.schmidt@balestrierefariello.com  
*Attorneys for Plaintiffs*  
*\*Pro hac vice application forthcoming*

Anastasia Mazzella (Cal. Bar. No. 245201)  
**KABATECK LLP**  
633 West Fifth Street, Suite 3200  
Los Angeles, California 90071  
Telephone: (213) 217-5007  
Facsimile: (213) 217-5010  
am@kbklawyers.com  
*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JULIA HUBBARD and KAYLA  
GOEDINGHAUS,

Plaintiffs,

vs.

TRAMMELL S. CROW, JR.,  
DR. BENJAMIN TODD ELLER,  
RICHARD HUBBARD, DR. MELISSA  
MILLER, DR. JOSEPH BOLIN,  
DR. SCOTT WOODS,  
DR. MRUGESHKUMAR SHAH,  
MICHAEL CAIN, COE JURACEK,  
PHILIP ECOB, H.J. COLE, TEXAS

Case No.: 2:22-cv-7957

COMPLAINT FOR  
VIOLATIONS OF THE  
TRAFFICKING VICTIMS  
PROTECTION ACT AND  
RACKETEER INFLUENCED  
AND CORRUPT  
ORGANIZATIONS ACT

DEMAND FOR JURY TRIAL

11/01/2022

RANGER CODY MITCHELL, KURT  
KNEWITZ, PAUL PENDERGRASS,  
RALPH ROGERS, ROBERT PRUITT,  
SCOTT BRUNSON, CASE GROVER,  
RICHARD BUTLER, MARK MOLINA,  
MICHAEL HYNES, JR., SHAWN  
MAYER, JADE MAYER, RCI  
HOSPITALITY HOLDINGS, INC.,  
INTEGRITY BASED MARKETING, LLC,  
STORM FITNESS NUTRITION, LLC,  
ULTRA COMBAT NUTRITION, LLC,  
ECOLOFT HOMES LLC, ELEVATED  
WELLNESS PARTNERS LLC, DOE  
INDIVIDUALS 1-20, and DOE  
COMPANIES 21-30

Defendants.

1 Plaintiffs Julia Hubbard (“Hubbard”) and Kayla Goedinghaus  
2 (“Goedinghaus”), by their attorneys Balestriere Fariello, for their Complaint  
3 against Trammell S. Crow, Jr. (“Crow”), Dr. Benjamin Todd Eller (“Eller”),  
4 Richard Hubbard (“Rick”), Dr. Melissa Miller (“Miller”), Dr. Joseph Bolin  
5 (“Bolin”), Dr. Scott Woods (“Woods”), Dr. Mrugeshkumar Shah (“Shah”),  
6 Michael Cain (“Cain”), Coe Juracek (“Juracek”), Philip Ecob (“Ecob”), H.J.  
7 Cole (“Cole”), Texas Ranger Cody Mitchell (“Mitchell”), Kurt Knewitz  
8 (“Knewitz”), Paul Pendergrass (“Pendergrass”), Ralph Rogers (“Rogers”),  
9 Robert Pruitt (“Pruitt”), Scott Brunson (“Brunson”), Case Grover  
10 (“Grover”), Richard Butler (“Butler”), Mark Molina (“Molina”), Michael  
11 Hynes, Jr. (“Hynes”), Shawn Mayer (“Shawn Mayer”), Jade Mayer  
12 (“Jade Mayer”), RCI Hospitality Holdings, Inc. (“RCI”), Integrity Based  
13 Marketing, LLC, Storm Fitness Nutrition, LLC, Ultra Combat Nutrition,  
14 LLC, EcoLoft Homes LLC, Elevated Wellness Partners LLC, Doe  
15 Individuals 1–20, and Doe Companies 21–30 respectfully allege as follows.

### 16 NATURE OF THE CASE

17 1. For nearly a decade or more, Defendant Richard Hubbard  
18 (“Rick”) ran a sex and labor trafficking venture (the “Venture”) for his  
19 financial gain, with the essential financial assistance and influence of  
20 environmental philanthropist Defendant Trammell S. Crow, Jr., and at least  
21 eight other prominent Texas businessmen.

22 2. To develop and run this successful Enterprise, including  
23 controlling the victims—who included at least Rick’s then-wife Plaintiff  
24 Julia Hubbard (“Hubbard”), whom Rick made into a virtual long-term sex  
25 slave, his later fiancée Plaintiff Kayla Goedinghaus (“Goedinghaus”), whom  
26 he also had those in the Venture beat and rape, and others whose identities  
27 are unknown at this time—Rick utilized the essential services of numerous  
28 doctors, a prominent police officer, and others.

1           3. Dozens of times, generally at “parties” (the “Forced Sex  
2 Parties”) over the course of years, Rick forced Hubbard, Goedinghaus, and  
3 others to perform sex acts for payment, which payments he retained, and to  
4 secure business relationships.

5           4. Rick used force, threats of force, fraud, or coercion to compel  
6 Hubbard and Goedinghaus to engage in commercial sex acts with the  
7 knowledge or reckless disregard of all Defendants, who each individually  
8 benefitted from the Venture.

9           5. This force and threats included beatings to the point of  
10 hospitalization—twice Rick injured Hubbard’s neck, requiring spinal  
11 surgery—and threats to harm Hubbard’s and Goedinghaus’s children, who  
12 were all under six years old at the time Rick, threatened them with the  
13 support of others in the Venture.

14           6. Indeed, the misconduct and crimes of the Defendants were so  
15 egregious that the Venture became an illegal racketeering enterprise (the  
16 “Enterprise”), whereby the Defendants conspired together to commit  
17 various unlawful predicate acts, including coercion, human trafficking,  
18 dealing in controlled substances, and wire fraud, all of which proximately  
19 harmed Plaintiffs and almost certainly other victims.

20                           *Dr. Todd Eller and the Medical Doctor Defendants*

21           7. Key to Rick’s control of Hubbard and Goedinghaus—and the  
22 essential functioning of the Venture—was the work of psychologist Dr.  
23 Benjamin Todd Eller (“Eller”), who lives and works in this District.

24           8. Fully aware of the lies he was telling under oath for payment,  
25 Eller prepared false affidavits and other documents claiming that Hubbard  
26 and Goedinghaus were seriously psychiatrically troubled persons under his  
27 care and thus, he swore, required heavy doses of a variety of medications,

1 including Xanax, Adderall, Oxycodone, Marinol, Soma, Lorezapan,  
2 Ambien, and Trazadone.

3 9. This was a rank lie: Eller instead acted at Rick's behest in return  
4 for hundreds of thousands of dollars of payments over the course of years.

5 10. Further, while Eller claimed that Hubbard was his patient, they  
6 spoke only twice.

7 11. When Eller did speak with his "patients," Hubbard and  
8 Goedinghaus both informed Eller that Rick was fraudulently obtaining  
9 drugs in order to force them to commit sex acts. Hubbard and Goedinghaus  
10 asked for Eller's help.

11 12. Eller ignored these pleas for help.

12 13. Rick forced Hubbard and Goedinghaus to take these drugs in  
13 order to make them participate in the sex acts. Rick also would threaten to  
14 withhold Xanax and other drugs if not obeyed, causing both Hubbard and  
15 Goedinghaus to suffer potentially fatal seizures caused by withdrawal from  
16 Xanax and Clonazepam. And Plaintiffs believe they are not alone. Rick  
17 would regularly bring other women to the Forced Sex Parties that he met  
18 through the website Adult Friend Finder and other similar adult websites,  
19 and also encouraged Hubbard and Goedinghaus to bring women as well.

20 14. As a psychologist, Eller was unable to write prescriptions on his  
21 own. However, Rick found medical doctors who were willing to write  
22 prescriptions based on Eller's written recommendation. These physicians  
23 included Dr. Melissa Miller ("Miller"), Dr. Joseph Bolin ("Bolin"), Dr. Scott  
24 Woods ("Woods"), and Dr. Mrugeshkumar Shah ("Shah") (the "Medical  
25 Doctor Defendants").

26 15. It is not as if these doctors did not speak to the Plaintiffs; they  
27 did—but they ignored Plaintiffs' pleas for assistance, and, in the cases of  
28 Defendants Woods and Shah, ignored Hubbard's visible bruising, frequent

1 injuries, and frequent surgeries indicating physical abuse. Each of the  
2 Medical Doctor Defendants were informed by either Hubbard,  
3 Goedinghaus, or both that the drugs the Medical Doctor Defendants were  
4 prescribing were being used for an improper purpose, that Hubbard and  
5 Goedinghaus were being abused by Rick, and that Hubbard and  
6 Goedinghaus needed help.

7 16. None of the Medical Doctor Defendants took any action in  
8 response to these reports, and instead simply prescribed the drugs that Eller  
9 had requested in return for payment from Rick.

10 *The Fixer Defendants: Texas Ranger Cody Mitchell and Kurt Knewitz*

11 17. Rick's structured human trafficking Venture and racketeering  
12 Enterprise relied not just on these medical professionals, but on other  
13 "fixers" – including at least one law enforcement officer ironically charged  
14 with investigating human trafficking—to maintain and grow the illegal  
15 organization over the years.

16 18. In addition to the drugs provided by Eller and the Medical  
17 Doctor Defendants, Rick would also use beatings, choking, guns, and  
18 threats of legal process to cause Hubbard and Goedinghaus to do as he  
19 wished, often through the use of the Fixer Defendants: Texas Ranger Cody  
20 Mitchell and Kurt Knewitz (the "Fixer Defendants").

21 19. Rick's threats of legal process were assisted by Defendant Cody  
22 Mitchell, a longtime friend of Rick's and member of the elite Texas Ranger  
23 Division who specializes in human trafficking and child exploitation cases.

24 20. Rick had a close friendship with Mitchell and would regularly  
25 threaten Hubbard and Goedinghaus with arrest under false charges, telling  
26 them that if they did go to law enforcement, no one would believe them.

27 21. Rick informed Mitchell in detail of the operations of the Venture  
28 and provided him with naked photos of Hubbard and Goedinghaus.

1           22. On one occasion, Rick shared with Hubbard a photograph that  
2 Mitchell had taken in his police cruiser and sent to Rick. In the photo,  
3 Mitchell was holding his penis in one hand and an open bottle of Jack  
4 Daniels whiskey in the other.

5           23. This photo was presented as a threat to Hubbard: Mitchell  
6 considered himself above the law and would do what he needed to do to  
7 protect Rick and the Venture.

8           24. The Venture also relied on another friend of Rick's, oil and gas  
9 investor Defendant Kurt Knewitz, who recruited Hubbard to the Venture.

10          25. Knewitz acted as a "fixer" to the Venture, playing the role of  
11 "good cop" as needed.

12          26. In particular, Knewitz would reassure Hubbard when she was  
13 concerned about Rick's behavior, particularly early on in Hubbard's  
14 involvement in the Venture. Knewitz also attempted to keep Goedinghaus  
15 in the Venture by the same means.

16          27. In return for Knewitz's assistance to the Venture, Rick forced  
17 Hubbard and Goedinghaus to perform sex acts with Knewitz. Knewitz also  
18 participated in many of the Forced Sex Parties, including many at which  
19 Hubbard was present.

20          28. Later, to assist the work of Knewitz and Mitchell, the Venture  
21 even enticed Hubbard's ex-husband, Shawn Mayer, and his new wife, Jade  
22 Mayer, to assist the Venture by exercising control over Hubbard's  
23 children—at Rick's direction and the Venture's benefit—in exchange for  
24 cash payments and other benefits.

25                   *Trammell Crow and the Other Investor Defendants*

26          29. Essential to this operation was funding to run the general  
27 operations and provisioning of the Plaintiffs and others, as well as to pay  
28 Eller and the Medical Doctor Defendants, and accrue profits to Rick himself.



1           30. The key financial supporter of the enterprise was Defendant  
2 Trammell S. Crow, Jr., a billionaire philanthropist and prominent member  
3 of the Dallas community whom Hubbard had known before meeting Rick.

4           31. Crow was involved at the very start of the Venture in 2010, knew  
5 full well all the details of the force, fraud, threat, and coercion which Rick  
6 used (in substantial part due to his prior relationship with Hubbard), and  
7 without him the Venture never could have succeeded, or indeed, ever  
8 gotten started.

9           32. Almost as much as Rick, Trammell was a key to the Venture's  
10 existence and long running success.

11           33. Once Hubbard introduced Crow to Rick, Rick ingratiated  
12 himself with Crow.

13           34. Rick convinced Crow to invest in the Venture, which Crow did.  
14 In return, Rick would traffic Hubbard and Goedinghaus to Crow, would  
15 supply drugs for Crow's parties, would force Hubbard to have sex with  
16 Crow's then-girlfriend in front of Crow (which Rick and Crow both  
17 videotaped and was used both for Crow's enjoyment and to threaten  
18 Hubbard), would force Goedinghaus to have sex in front of Crow (during  
19 the course of one Forced Sex Party over the course of several days), and  
20 would traffic other victims of the Venture to Crow at the "parties" on  
21 dozens of occasions over the course of years.

22           35. Crow's lifestyle meshed well with Rick's activities, as Crow  
23 enjoyed hosting drug-fueled parties, which were attended by many of the  
24 Investor Defendants (identified below) and others, including other victims  
25 of the Venture that Rick would bring to the parties. Crow particularly  
26 enjoyed the use of cocaine, so much (according to Rick) that he had his  
27 housekeeping staff fill containers in his home with cocaine, and refill as  
28 needed on a daily basis.



1           36. Hubbard told Crow that Rick was forcing her to perform sex  
2 acts and forcing her to take drugs to induce such acts.

3           37. However, Crow had grown to enjoy Rick's services and took no  
4 action to either help Hubbard or stop doing business with Rick and the  
5 Venture.

6           38. In addition to the direct financial benefit from Crow, Rick and  
7 Crow benefitted from working together to get others to join the Venture as  
8 co-investors and clients.

9           39. The Venture's list of Investor Defendants grew to include the  
10 following, all of whom either knew or recklessly disregarded the fact that  
11 Rick was using force, threats of force, fraud, or coercion to cause Hubbard  
12 and Goedinghaus, and others, to engage in sex acts; knowingly supported  
13 the Venture in its activities (including, but not limited to, by providing  
14 funding to the Venture); and received benefits from the Venture (including,  
15 but not limited to, receiving sex and media of naked women or individuals  
16 engaged in sex acts).

17           40. The Investor Defendants include:

- 18           • **Scott Brunson** (Owner, Luna Pietra LLC): Brunson supported the  
19 Venture by providing at least \$27,000 in financial support for the  
20 Venture, had knowledge of the Venture's acts by attending  
21 parties at which at Goedinghaus was forced to perform sex acts,  
22 and benefitted by Rick forcing Goedinghaus to perform sex acts  
23 with Brunson.
- 24           • **Michael Cain** (President and Executive Producer, M3 Films,  
25 LLC): Cain supported the Venture by providing financial support  
26 and drugs to the Venture, had knowledge of the Venture's acts  
27 by attending parties in which at least Hubbard was forced to

perform sex acts, and benefitted by Rick forcing Hubbard to perform sex acts in front of Cain.

- **H.J. Cole** (Founder of HJ Cole & Associates): Cole supported the Venture by providing drugs to the Venture, had knowledge of the Venture's acts by attending parties in which at least Hubbard was forced to perform sex acts, and benefitted by Rick forcing Hubbard to perform sex acts with him.
- **Philip Ecob** (President, Twynym Capital): Ecob supported the Venture by providing financial support to the Venture, had knowledge of the Venture's acts including the Forced Sex Parties, and benefitted through his employment at Crow Holdings Capital, Crow's family company, where Ecob was well compensated, in part to maintain his silence regarding what he knew about Crow's Forced Sex Parties.
- **Coe Juracek** (Senior Managing Director, Crow Holdings Capital): Juracek supported the Venture by providing financial support to the Venture, had knowledge of the Venture's acts including the Forced Sex Parties, and benefitted by receiving naked photos of Hubbard. Juracek also benefitted from his employment at Crow Holdings Capital, where Juracek was well compensated, in part to maintain his silence regarding what he knew about Crow's Forced Sex Parties.
- **Paul Pendergrass** (Owner of P<sup>3</sup> LLC): Pendergrass supported the Venture by providing more than \$250,000 to the Venture, had knowledge of the Venture's Forced Sex Parties and the events that occurred at those parties, and benefitted by expectation of receiving funds from the Venture and receiving naked photos of Hubbard.

- 1       • **Robert “Bob” Pruitt** (President of Data Center Equipment &  
2       Support, LLC): Pruitt supported the Venture by providing  
3       financial support to Rick and the Venture, including employing  
4       Rick and paying Rick’s utility bills. Rick forced Hubbard to  
5       provide naked photographs of herself to Pruitt and to perform  
6       sex acts with Pruitt.
- 7       • **Ralph Rogers** (Real estate investor): Rogers supported the  
8       Venture by providing significant financial support to Rick to  
9       support the Venture, in the form of cash, supplying drugs to the  
10      Venture, and allowing Rick to live rent free on his property since  
11      2018. Rogers had knowledge of the Venture’s acts by attending  
12      parties in which Goedinghaus was forced to perform sex acts and  
13      had knowledge of the Forced Sex Parties in which Hubbard was  
14      forced to have sex, and benefitted by Rick allowing Rogers to  
15      watch Goedinghaus performing sex acts and received naked  
16      photos of Hubbard.

*The Labor Trafficking Defendants*

17       41. Hubbard finally left Rick in March 2017, moving out due to the  
18      abuse. However, the scope of Rick’s work in establishing and running a  
19      now-well-funded human trafficking Venture that relied on the support of  
20      medical and law enforcement professionals prevented Hubbard from fully  
21      escaping the Venture.  
22

23       42. Instead, Rick and the Venture continued to unlawfully benefit  
24      by labor trafficking Hubbard even after she no longer lived with Rick.

25       43. Specifically, Case Grover, Marc Molina, Richard Butler, RCI  
26      Entertainment, Inc., and Michael Hynes, Jr. (the “Labor Trafficking  
27      Defendants”) all benefitted by knowingly receiving the labor of Hubbard

1 through means of force, threats of force, physical restraint, serious harm, or  
2 threats of such means.

3 44. Grover, Molina, and Butler were all managers at Silver City  
4 Cabaret (the “Cabaret”), a gentleman’s club in Dallas, Texas that is owned  
5 by RCI Entertainment, Inc.

6 45. Grover forced Hubbard to work at the Cabaret, confiscating a  
7 portion of her wages for his personal benefit with the knowledge of Molina,  
8 Butler, and RCI Entertainment, Inc.

9 46. Grover would cause Hubbard to perform such work through  
10 physical abuse and threats, including beating Hubbard so hard that  
11 Hubbard suffered multiple broken ribs and threatening Hubbard with  
12 guns, including an AK-47 which Grover brought to Hubbard’s home and  
13 fired repeatedly. Grover even intentionally crashed and totaled Hubbard’s  
14 car so that she was further dependent on Grover for transportation.

15 47. Grover was also in regular contact with Rick, exchanging  
16 information concerning Hubbard for their mutual benefit and the  
17 advancement of the Venture. Grover would also threaten to “give  
18 [Hubbard] back” to Rick if she disobeyed him.

19 48. After Hubbard fled Grover, she was further labor trafficked by  
20 Michael Hynes, Jr., on behalf of the Venture. Hynes forced Hubbard to sell  
21 drugs for his financial benefit at various clubs owned by RCI Hospitality  
22 Holdings, Inc., called XTC and Temptations. Hynes also, at Rick’s urging,  
23 would force Hubbard to have sex with Hynes in front of his drug dealer in  
24 exchange for drugs.

25 49. Hynes caused Hubbard to comply through both physical harm  
26 and the threat of legal process from his father, Police Officer Michael Hynes,  
27 Sr., a member of the Fort Worth Police Department, who led Hubbard to

1 believe that she would be safe by virtue of his position. However, Hubbard  
2 was wrong.

3 50. Just like Grover, Hynes was in regular contact with Rick and  
4 would trade information on Hubbard's whereabouts with him, so that Rick  
5 could assist in and benefit from Hynes's labor trafficking of Hubbard. Like  
6 Grover, Hynes would also threaten to "give [Hubbard] back" to Rick if she  
7 did not do as Hynes demanded.

8 51. Hubbard eventually escaped the Venture in November 2018.

9 52. Plaintiff Goedinghaus, meanwhile, escaped from the Venture in  
10 January 2020.

### 11 JURISDICTION AND VENUE

12 53. Venue is appropriate in the Central District of California as  
13 Defendant Eller resides and operates his business in the District and his acts  
14 were central to and essential to the work of the Venture described herein.

15 54. This Court has subject matter jurisdiction over this action  
16 pursuant to 18 U.S.C. § 1964(a), which provides the district courts of the  
17 United States jurisdiction over violations of 18 U.S.C. § 1962.

18 55. This Court also has subject matter jurisdiction over this action  
19 pursuant to 18 U.S.C. § 1595, which provides the district courts of the United  
20 States jurisdiction over violations of 18 U.S.C. § 1591.

21 56. This Court also has subject matter jurisdiction over this action  
22 pursuant to 18 U.S.C. § 1030(g), which provides the district courts of the  
23 United States jurisdiction over violations of 18 U.S.C. § 1030.

24 57. This Court has supplemental jurisdiction over the remaining  
25 claims pursuant to 28 U.S.C. § 1367(a), as those claims form part of the same  
26 case or controversy as the related federal claims over which this Court has  
27 original jurisdiction.

58. This Court has personal jurisdiction over the parties, as the actions that constitute the violations of 18 U.S.C. § 1962(c) and (d) were made possible by the acts of Defendant Eller, which occurred in this District. Further, the Court has personal jurisdiction over each Defendant because each Defendant who does not reside in this District purposefully availed themselves of the legal protection of the State of California and purposefully directed business to this State.

59. Moreover, nationwide service of process is conferred by 18 U.S.C. § 1965(b) for violations of 18 U.S.C. § 1962 as long as the Court has personal jurisdiction over at least one party.

### **PARTIES**

#### *Plaintiffs*

60. Plaintiff Julia Hubbard is an individual who resides in Fairfax, Virginia.

61. Plaintiff Kayla Goedinghaus is an individual who resides in Fairfax, Virginia.

#### *Defendants*

62. Defendant Trammell S. Crow is an individual who resides in Dallas, Texas.

63. Defendant Dr. Benjamin Todd Eller is an individual who resides in Santa Monica, California.

64. Defendant Richard Hubbard is an individual who resides in Marble Falls, Texas.

65. Defendant Dr. Melissa Miller is an individual who resides in Texas.

66. Defendant Dr. Joseph Bolin is an individual who resides in Plano, Texas.

1           67. Defendant Dr. Scott Woods is an individual who resides in  
2 Texas.

3           68. Defendant Dr. Mrugeshkumar Shah is an individual who is  
4 currently incarcerated at FCI Butner in Butner, North Carolina.

5           69. Defendant Michael Cain is an individual who resides in Dallas,  
6 Texas.

7           70. Defendant Coe Juracek an individual who resides in Dallas,  
8 Texas.

9           71. Defendant Philip Ecob an individual who resides in Dallas,  
10 Texas.

11           72. Defendant H.J. Cole an individual who resides in Dallas, Texas.

12           73. Defendant Texas Ranger Cody Mitchell an individual who  
13 resides in Austin, Texas.

14           74. Defendant Paul Pendergrass is an individual who resides in  
15 Texas.

16           75. Defendant Ralph Rogers is an individual who resides in Marble  
17 Falls, Texas.

18           76. Defendant Robert Pruitt is an individual who resides in Plano,  
19 Texas.

20           77. Defendant Scott Brunson is an individual who resides in the  
21 Greater Austin area of Texas.

22           78. Defendant Case Grover is an individual who resides in  
23 McKinney, Texas.

24           79. Defendant Richard Butler is an individual who resides in Dallas,  
25 Texas.

26           80. Defendant Mark Molina is an individual who resides in Dallas,  
27 Texas.



81. Defendant Michael Hynes, Jr. is an individual who resides in Mansfield, Texas.

82. Defendant Shawn Mayer is an individual who resides in Justin, Texas.

83. Defendant Jade Mayer is an individual who resides in Justin, Texas.

84. Defendant RCI Hospitality Holdings, Inc. is a Delaware corporation with a principal place of business in New York.

85. Integrity Based Marketing, LLC is a Texas limited liability company with a principle place of business in Marble Falls, Texas.

86. Storm Fitness Nutrition, LLC is a Texas limited liability company with a principle place of business in Marble Falls, Texas.

87. Ultra Combat Nutrition, LLC is a Texas limited liability company with a principle place of business in Marble Falls, Texas.

88. EcoLoft Homes LLC is a Texas limited liability company with a principle place of business in Marble Falls, Texas.

89. Elevated Wellness Partners LLC is a Texas limited liability company with a principle place of business in Marble Falls, Texas.

90. Doe Individuals 1 through 20 are fictitiously-named individuals whose identities will be discovered during the course of litigation.

91. Doe Companies 21 through 30 are fictitiously-named entities whose identities will be discovered during the course of litigation.

### *Third-Parties*

92. Non-Party Police Officer Michael Hynes, Sr., is an individual who resides in Mansfield, Texas.

93. Non-Parties Laura Ellwell, Monique Farkas, Renee Heaton, Angela Pace, and Kim Ponder are believed victims of the Venture who reside in Texas.



1           103. Rick initially expressed this need for financial control as a desire  
2 to protect and provide for his new, pregnant wife. Hubbard, who had been  
3 raised in a conservative Mormon household, at first thought this desire was  
4 normal and even gallant.

5           104. However, Rick's ability to provide hit a snag when, during their  
6 first year of marriage in 2010 when Hubbard was still pregnant, he was  
7 arrested for financial fraud.

8           105. Rick's arrest was in connection with a company he owned,  
9 Texas Sunrooms and Windows, for which he was charged with felony  
10 misappropriation of fiduciary property after scamming an elderly woman  
11 out of \$3,400. Rick pleaded guilty in exchange for a fine, restitution, and  
12 three years' probation.

13           106. Following his arrest, Rick became increasingly desperate to  
14 improve his financial situation.

15           107. As Rick saw himself as a successful business owner, he refused  
16 to seek employment, but rather sought to start a successful new business.  
17 However, this proved harder than Rick had expected, and Rick quickly  
18 became frustrated.

19           *Rick Begins to Pressure Hubbard to Attend Sex Parties*

20           108. Seeking an outlet for his financial frustrations, in 2010, Rick  
21 began expressing a desire for Hubbard to engage in "swinging" as he called  
22 it. Rick described this as something that he had done in the past and would  
23 involve Rick and Hubbard going to "swinger parties" where they would  
24 each meet and have sex with other people.

25           109. This made Hubbard extremely uncomfortable.

26           110. Rick, however, was persistent, and spoke at length of how it was  
27 important to "break free" of the "social construct" of monogamy, as well as  
28 the "religious indoctrination" of Hubbard's strict conservative upbringing.

111. Rick also promised that he would never force Hubbard to do anything that she was not comfortable with.

112. Wanting to please her new husband, Hubbard reluctantly agreed to try out swinger parties with Rick.

113. While Hubbard did not enjoy them, these parties, at first, were as Rick had promised: they were infrequent and consensual.

*Rick Meets Defendant Dr. Eller and the Venture Begins*

114. Meanwhile, by early 2011, Rick's financial fortune had failed to improve.

115. However, Rick was not deterred, and continue to invest time and money into a marketing program called Chet Holmes International.

116. Through the program, Rick met Dr. Benjamin Todd Eller, a psychologist who lived and worked in Santa Monica, California. In 2012, Rick began using Eller's services as a "business consultant" to advise him in the Chet Holmes methods.

117. Dr. Eller had a respectable background. He held a PhD from the University of California Los Angeles, where he had taught and also worked for the university's National Center for the Study of Evaluation, a highly respected research center for developing methods for child education which are then used by K-12 schools throughout the country. He also is currently a professor at West Coast University. Eller also periodically appears as a television commentator.

118. Eller also had an entrepreneurial streak of lending his credentials to various enterprises: he is a co-founder of Devotional Connection, a Christian devotional social networking service, and Chief Educational Officer of BabyFirst TV, a children's television production company, which used Eller's educational psychology background to promote programs such as "Harry the Bunny," "Peekaboo,"

1 “VocabuLarry,” and “Clor Crew,” available through the company’s app  
2 and certain Hulu plans.

3 119. However, despite his experience, and being engaged as Rick’s  
4 “business consultant,” Eller failed to help Rick form a successful legitimate  
5 business.

6 120. Instead, Rick and Eller realized that they could make much  
7 more money by trafficking women to wealthy businessmen. To do so, they  
8 took the initial steps in creating the Venture.

9 *Rick and Eller Begin to Build the Venture*

10 121. Building a successful sex and labor trafficking venture required  
11 work.

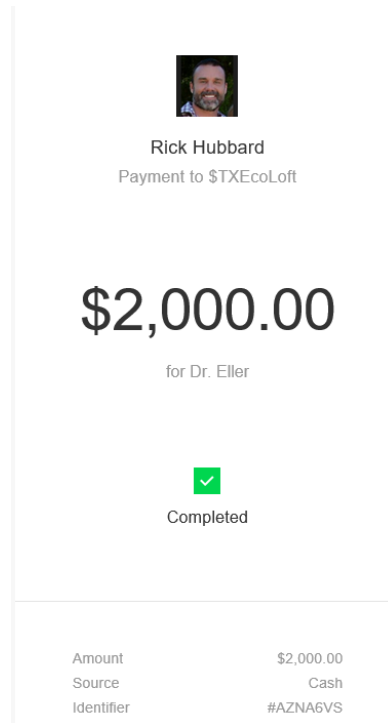
12 122. First, the Venture needed women to traffic, but Rick was ready  
13 and willing to traffic his wife, Hubbard. While Rick knew that Hubbard  
14 would not agree to this, Rick realized that he could use the sex parties they  
15 had been arranging as a cover.

16 123. Still, Rick knew that he would need Hubbard to attend far more  
17 sex parties in order for the Venture to be as profitable as he wished. This  
18 was where Eller came in: Eller would fraudulently use his psychological  
19 practice to force Hubbard to engage in commercial sex at parties—the  
20 Forced Sex Parties.

21 124. Rick and Eller’s scheme worked like this: Eller would claim that  
22 Hubbard was his patient and had serious psychological issues requiring  
23 heavy medication. Rick would then procure high doses of drugs, including  
24 Xanax, Adderall, Oxycodone, Marinol, Soma, Lorezapan, Ambien, and  
25 Trazadone, and force Hubbard to take them in high doses order to make her  
26 pliable. Rick kept these drugs in what he called his “prescription bar.”

125. For these services Rick paid Eller a monthly fee ranging from \$2,500 to \$5,000, resulting in what Plaintiffs believe to be hundreds of thousands of dollars in payments to Eller over the years.

126. Below is an example of one such partial payment to Eller. Rick sent the below screenshot to Goedinghaus to show her that he had paid Eller.



127. Such drugs as Eller recommended, especially when mixed together and in high doses, made it both difficult for Hubbard to resist Rick's demands when she ingested the drugs, and, over time, their addictive nature would allow Rick further control over her life.

128. As an added benefit, Rick could also sell some of the drugs in order to obtain additional profit for the Venture.

129. Beyond the drugs themselves, Eller's credibility as a respected psychologist—including the very fact that he represented such drugs as necessary for Hubbard—gave Rick and the Venture even further control over Hubbard.

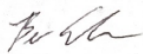
1        130. As Eller knew very well, psychologists are given great deference  
2 when giving what they represent as their professional opinion, especially  
3 psychologists with a respectable professional background who insist that  
4 their patient needs medication. If Eller said that Hubbard was a danger to  
5 herself and her daughter, and particularly if he was willing to say so under  
6 oath, few people would believe Hubbard over him.

7        131. Eller, having been a psychologist for decades, realized how  
8 powerful this was: it meant that Hubbard would be unlikely to be believed  
9 by the police or by courts, meaning that she had no recourse to anything  
10 that Rick might force her to do, and if she did try to resist, she was unlikely  
11 to retain any custody of her daughter. Any protests that Hubbard made  
12 would simply be dismissed as paranoid delusions.

13        132. Below is an example of the type of signed documents that Eller  
14 would submit to courts. This is an excerpt that Eller submitted on October  
15 3, 2019, to assist Rick in a failed attempt to bring Hubbard back to the  
16 Venture by maintaining control of Hubbard's children:

17        I have rarely disagreed with Rick's desires to maintain an open mind hoping that someday Julia will truly change and  
18 become the healthy, honest, and nurturing mother we all believed she could one-day be, but over the last 11 years of  
19 observations of these children, it is my professional opinion that even if she began counseling and rigorous inpatient  
20 behavior modification today, there is less than 10% chance that Julia Hubbard will ever be anything but a dangerous  
21 and destructive force to her children. We believe the children's continued healthy environments and their chance to  
22 fully recover from the recent and past traumas is far too important to risk with ANY future contact with their mother.  
23 We highly recommend that Summer Hubbard should remain in the continued and exclusive custody of Rick Hubbard.

24 Benjamin Todd Eller, Ph.D.

25 



1           133. Years later, in 2022, when the family court judge in Hubbard's  
 2 custody case had the opportunity to more fully hear matters, the court saw  
 3 through these falsehoods alleged by Eller and, ultimately, granted Hubbard  
 4 custody of her child and found Rick to have engaged in domestic and sexual  
 5 abuse:

6  
 7           THE COURT: It's clear to me you have zero  
 8 respect for anyone else.

9           MR. HUBBARD: That's not true.

10          THE COURT: You have no concern for your  
 11 child's relationship with anybody else.

12          THE COURT: And then he can leave after  
 13 that. And that's the way it is. You dug your own  
 14 grave, Mr. Hubbard. And it's become clear to me that  
 15 you're not serving your daughter's best interest here.  
 16 So that will be the order of the Court.

17  
 18  
 19  
 20          *Conservatorship and Support*

21          The Court, having considered the circumstances of the parents and of the child, finds that  
 22 the following orders are in the best interest of the child.

23          The Court finds that RICHARD HUBBARD has a history of domestic violence and  
 24 sexual abuse, against JULIA HUBBARD within a two-year period preceding the filing of the

25  
 26 IMMO Hubbard and ITIO S.L.H.  
 27 Final Decree

Page 2 of 20

28           134. The court not only gave Hubbard full custody, it also barred  
 29 Rick from any communication with his child except by pre-approved letters  
 30 to a therapist—an extreme result reflecting the wrongdoing that the court  
 31 saw from Rick.

32           135. While Eller held himself out as Hubbard's psychologist, this was  
 33 a rank lie: Eller exercised no professional judgment and simply did

1 whatever Rick asked him to. Many times, Rick would even draft a document  
2 himself, and Eller simply signed what Rick presented to him.

3 136. In fact, despite holding himself out as Hubbard's psychologist  
4 for more than five years, Eller only met or spoke with Hubbard twice.

5 137. Eller's work was essential to the Venture. Without Eller's work,  
6 Hubbard (and later Plaintiff Goedinghaus) could not have been forced to  
7 perform commercial sex acts, at least not close to the scale at which the  
8 Venture operated.

9 *The Venture Adds the Medical Doctor Defendants*

10 138. While drugs were essential to the Venture and key to Eller's role  
11 in it, Eller could not supply the Venture without more help.

12 139. Because Eller was not a medical doctor, he was unable to write  
13 the prescriptions for the medications that were essential for the Venture. But  
14 the Venture quickly found a way around this roadblock. Starting in Fall  
15 2010, it located the Medical Doctor Defendants, four physicians who were  
16 eager to write prescriptions based only on Eller's written recommendations  
17 in exchange for payments from Rick.

18 140. Below is an example of one such letter, from Spring 2019, in  
19 which Eller did not even properly spell the name of Plaintiff Goedinghaus,  
20 Eller's supposed patient:



Best Practices, LLC  
Todd Eller, Ph. D. PD2857  
364 West Wilson Ave  
Suite 5  
Glendale, CA 91203  
(800) 598-7889

To whom it may concern,

Kayla Goodinghouse suffers from severe post-traumatic stress order and clinical depression. Her episodes of fatigue, emotional exhaustion and crying have become more frequent. Kayla suffered multiple traumas from childhood abuse, kidnapping and rape. She is currently on the following medications:

- Zoloft
- Prazosin
- Ambilify

1           141. The Medical Doctor Defendants constitute Dr. Joseph Bolin,  
2 Dr. Melissa Miller, Dr. Mrugeshkumar Shah, and Dr. Scott Woods.

3           142. The Medical Doctor Defendants all knowingly provided  
4 essential support to the Venture, with knowledge or at least reckless  
5 disregard of its improper activities, in exchange for financial benefit.

6           143. Each and every one of the Medical Doctor Defendants were  
7 informed by Plaintiffs that the drugs that the Medical Doctor Defendants  
8 were prescribing were being used for an improper purpose, that Hubbard  
9 and Goedinghaus were being abused by Rick, and that Hubbard and  
10 Goedinghaus needed help.

11           144. None of the Medical Doctor Defendants took any action in  
12 response to these reports, and instead simply prescribed the drugs that Eller  
13 and Rick had requested.

14           145. Specifically:

- 15           • **Shah:** A pain management doctor that Hubbard began seeing in  
16 or about 2013. Shah and staff would issue prescriptions without  
17 questions. Shah was later found guilty at trial for a \$200 million  
18 medical kickback and bribery scheme separate from the Venture  
19 and is currently serving a 42-month sentence in federal prison.  
20 Over the course of multiple visits in Summer 2014, Hubbard  
21 told Shah that she did not need the drugs and was being forced  
22 to engage in sex against her. Shah's actions constituted a dealing  
23 in a controlled substance, a predicate act under RICO.
- 24           • **Bolin:** Rick would also at times direct Hubbard to Bolin, who  
25 was Rick's primary care physician. Like Shah, Bolin would issue  
26 any prescription that the Venture required without issue. In  
27 Summer 2018 Hubbard told Bolin that she did not need the  
28 drugs and was being forced to engage in sex against her will.

1 Bolin's actions constituted a dealing in a controlled substance, a  
2 predicate act under RICO.

- 3 • **Woods:** Rick also directed Hubbard to Woods, a psychiatrist.  
4 Rick acted eager for Hubbard to visit Woods, and Woods  
5 appeared particularly eager to prescribe drugs without  
6 question. Woods repeatedly assured Hubbard that he would  
7 give her "whatever [she] need[ed]," even when she repeatedly  
8 showed up for appointments while visibly on drugs. Rick  
9 would pay Woods \$100 per visit for this service. In 2017,  
10 Hubbard told Woods that she did not need the drugs and was  
11 being forced to engage in sex against her will. Woods's actions  
12 constituted a dealing in a controlled substance, a predicate act  
13 under RICO.

- 14 • **Miller:** Miller is a primary care physician who Rick forced  
15 Goedinghaus to visit starting in April or May 2019.  
16 Goedinghaus informed Miller that Rick was withholding her  
17 medications, thus forcing her into withdrawal, physically  
18 abusing her, including choking her out to the point of  
19 unconsciousness, and raping her, but Miller continued to  
20 provide drugs to Goedinghaus and provided no assistance.  
21 Miller's actions constituted a dealing in a controlled substance,  
22 a predicate act under RICO.

23 146. The Medical Doctor Defendants would prescribe large doses of  
24 a wide variety of medications, which allowed the Venture to function and  
25 should have caused the Medical Doctor Defendants to exercise further  
26 professional diligence, which they ignored in order to encourage the  
27 continued payments from the Venture.

1           147. Plaintiffs had even informed all Medical Doctor Defendants that  
2 Rick, on occasion, withheld or stole all medications prescribed to Hubbard  
3 and Goedinghaus to punish them.

4           148. But the Medical Doctor Defendants did not intervene or offer  
5 support in any other way, like recommend subsidized healthcare, as is  
6 typical for patients in Plaintiffs's financial position. The Medical Doctor  
7 Defendants were aware that Plaintiffs had no financial autonomy and were  
8 geographically isolated (where even a grocery store for basic supplies was  
9 thirty minutes away) and that their whereabouts and communication was  
10 monitored.

11           149. Even had Plaintiffs not informed the Medical Doctor  
12 Defendants of the Venture (which they did), the high doses prescribed  
13 without proper diligence alone was enough to place the Medical Doctor  
14 Defendants in reckless disregard of the fact that these drugs were being  
15 used for an improper purpose and reasonable diligence would have  
16 required further inquiry.

17           150. The drugs prescribed also included the so-called "Holy Trinity"  
18 of an opioid (Oxycodone), a benzodiazepine (Xanax or Clonazepam), and a  
19 carisoprodol (Soma). In this combination, they present a high risk of  
20 overdose and death as well as an extremely high risk of addiction.

21           151. Below are examples of drugs prescribed by Medical Doctor  
22 Defendants Shah and Woods to Hubbard (this reflects only a portion of  
23 prescriptions filled at CVS; the Venture also filled prescriptions at other  
24 retailers including Krogers and Walmart):

RX NUMBER	REL	NDC NUMBER	DRUG DESCRIPTION	PRESCRIBER NAME	DATE FILLED	QUANT DISP	PATIENT PD AMT	PAYER #	TP AUTHORIZATION #
732605	0	50111064701	FLUOXETINE HCL 10 MG CAPSULE	WOODS, MICHAEL S	09/02/2015	30	15.93	32730	4892324509025G
732607	0	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	09/02/2015	60	22.56	32730	4892298509024G
732607	1	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	10/03/2015	60	22.56	32730	5105608510033G
732607	2	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	11/02/2015	60	23.31	32730	5327686511021G
732607	3	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	11/29/2015	60	23.31	32730	5552763511296G
732607	4	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	12/26/2015	60	23.31	32730	5777974512269G
734905	0	10702005601	OXYCODONE HCL 10 MG TABLET	SHAH, MRUGESHKUMAR09/15/2015	180	92.36	32730	4977530509154G	
734906	0	00603258221	CARISOPRODOL 350 MG TABLET	SHAH, MRUGESHKUMAR09/15/2015	60	30.39	32730	4977538509150G	
734908	0	00378265001	AMITRIPTYLINE HCL 50 MG TAB	SHAH, MRUGESHKUMAR09/15/2015	60	11.49	32730	4977554509158G	
734908	1	00378265001	AMITRIPTYLINE HCL 50 MG TAB	SHAH, MRUGESHKUMAR11/02/2015	60	12.47	32730	5331818511025G	
745989	0	10702005601	OXYCODONE HCL 10 MG TABLET	SHAH, MRUGESHKUMAR11/10/2015	180	94.17	32730	5402472511109G	
745991	0	00603258221	CARISOPRODOL 350 MG TABLET	SHAH, MRUGESHKUMAR11/29/2015	60	16.47	22415	15333621348202299G	
745991	1	00603258221	CARISOPRODOL 350 MG TABLET	SHAH, MRUGESHKUMAR12/26/2015	60	16.47	22415	15360017349704099G	
745992	0	00378265001	AMITRIPTYLINE HCL 50 MG TAB	SHAH, MRUGESHKUMAR11/10/2015	60	12.47	32730	5402513511105G	
745992	1	00378265001	AMITRIPTYLINE HCL 50 MG TAB	SHAH, MRUGESHKUMAR12/07/2015	60	12.47	32730	5623288512070G	
752371	0	00378265001	AMITRIPTYLINE HCL 50 MG TAB	WOODS, MICHAEL S	01/19/2016	60	30.10	35410	16019600615803399G
752371	1	00378265001	AMITRIPTYLINE HCL 50 MG TAB	WOODS, MICHAEL S	02/16/2016	60	21.63	18980	16051408037902499G
752371	2	00378265001	AMITRIPTYLINE HCL 50 MG TAB	WOODS, MICHAEL S	03/17/2016	60	21.63	18980	16077027070603099G
752371	3	00378265001	AMITRIPTYLINE HCL 50 MG TAB	WOODS, MICHAEL S	05/02/2016	60	21.63	18980	16123667001104299G
752372	0	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	01/22/2016	60	16.90	27165	5060792997
752372	1	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	02/24/2016	60	16.90	27165	5094756617
752372	2	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	03/24/2016	60	16.92	27165	5132630940
752372	3	00781107905	ALPRAZOLAM 1 MG TABLET	WOODS, MICHAEL S	04/24/2016	60	23.31	32730	6875482604243G
764734	0	00603258221	CARISOPRODOL 350 MG TABLET	SHAH, MRUGESHKUMAR02/12/2016	60	13.91	22285	9995462602126G	

152. Below are examples of drugs prescribed by Medical Doctor Defendant Miller to Goedinghaus:

<u>RX NUMBER</u>	<u>REL</u>	<u>NDC NUMBER</u>	<u>DRUG DESCRIPTION</u>	<u>PRESCRIBER NAME</u>	<u>DATE FILLED</u>	<u>QUANT DISP</u>	<u>PATIENT PD AMT</u>	<u>PAYER #</u>	<u>TP AUTHORIZATION #</u>
845223	0	13107007001	DEXTROAMP-AMPHETAMIN 10 MG TAB	HOLCOMB, WILLIAM L	03/26/2019	60	36.67	36690	70845159033008G
854599	0	00093738498	VENLAFAXINE HCL ER 37.5 MG CAP	MILLER, MELISSA B	05/15/2019	15	18.87	36690	9506599905156G
854600	0	13107007301	DEXTROAMP-AMPHETAMIN 20 MG TAB	MILLER, MELISSA B	05/15/2019	60	31.83	36690	9507615905154G
854601	0	51991070701	ALPRAZOLAM 2 MG TABLET	MILLER, MELISSA B	05/15/2019	60	22.22	36690	9507002905158G
854608	0	70954001910	PRazosin 1 MG CAPSULE	MILLER, MELISSA B	06/13/2019	90	17.73	36690	4899897906136G
855303	0	55111015330	ONDANSETRON HCL 4 MG TABLET	MILLER, MELISSA B	08/06/2019	10	9.00	33010	6676480604
855304	0	13107002101	HYDROCODONE-ACETAMIN 10-325 MG	MILLER, MELISSA B	05/17/2019	12	11.16	36690	1813679905174G
857400	0	50111033401	METRONIDAZOLE 500 MG TABLET	MILLER, MELISSA B	05/30/2019	14	11.00	36690	7089939905301G
858099	0	00093738498	VENLAFAXINE HCL ER 37.5 MG CAP	MILLER, MELISSA B	06/24/2019	30	28.74	36690	9963678906242G
860099	0	51991070701	ALPRAZOLAM 2 MG TABLET	MILLER, MELISSA B	06/14/2019	60	22.22	36690	5192695906146G
860100	0	00555097302	DEXTROAMP-AMPHETAMIN 20 MG TAB	MILLER, MELISSA B	06/14/2019	60	31.83	36690	5087915906148G
865565	0	51991070701	ALPRAZOLAM 2 MG TABLET	MILLER, MELISSA B	07/13/2019	60	22.22	36690	1256979907138G
865566	0	00555097302	DEXTROAMP-AMPHETAMIN 20 MG TAB	MILLER, MELISSA B	07/13/2019	60	31.83	36690	1259800907136G
869658	0	65862056099	PANTOPRAZOLE SOD DR 40 MG TAB	MILLER, MELISSA B	08/05/2019	30	24.74	36690	3800085908051G
869659	0	13107007201	DEXTROAMP-AMPHETAMIN 15 MG TAB	MILLER, MELISSA B	08/05/2019	30	24.69	36690	3800409908053G
869660	0	43975033510	DEXTROAMP-AMPHET ER 25 MG CAP	MILLER, MELISSA B	08/05/2019	30	68.08	36690	3801194908057G
869665	0	50111033401	METRONIDAZOLE 500 MG TABLET	MILLER, MELISSA B	08/05/2019	42	15.00	36690	3799522908054G
869732	0	00093738498	VENLAFAXINE HCL ER 37.5 MG CAP	MILLER, MELISSA B	08/05/2019	30	28.74	36690	3928344908054G
869738	0	13107006001	ACETAMINOPHEN-COD #4 TABLET	MILLER, MELISSA B	08/05/2019	21	13.77	36690	3939463908050G
869739	0	51991070701	ALPRAZOLAM 2 MG TABLET	MILLER, MELISSA B	08/09/2019	45	24.06	27165	6680456244
874045	0	68180044101	CEPHALEXIN 250 MG/5 ML SUSP	MILLER, MELISSA B	08/28/2019	200	22.80	36690	7272424908282G
874848	0	43975033510	DEXTROAMP-AMPHET ER 25 MG CAP	MILLER, MELISSA B	09/03/2019	30	68.08	36690	9739729909034G
874869	0	51991070701	ALPRAZOLAM 2 MG TABLET	MILLER, MELISSA B	09/06/2019	45	18.91	36690	2888046909065G
874870	0	13107007201	DEXTROAMP-AMPHETAMIN 15 MG TAB	MILLER, MELISSA B	09/03/2019	30	24.69	36690	1171928909031G
875570	0	65862056099	PANTOPRAZOLE SOD DR 40 MG TAB	MILLER, MELISSA B	09/05/2019	30	24.74	36690	2646036909059G

153. In order to ensure she made her appointments, Rick would often send Hubbard calendar alerts for meetings with doctors (sometimes with misspellings, in the case of Defendant Bolin's name):

----- Forwarded message -----

From: Rick Hubbard <[rickhubbard@gmail.com](mailto:rickhubbard@gmail.com)>

Date: Fri, Jan 23, 2015, 1:03 PM

Subject: Invitation: Dr Bolen-Plano appt @ Mon Jan 26, 2015 11:30am - 12:30pm (Julia Hubbard)

To: [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) <[julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com)>

[more details »](#)

**Dr Bolen-Plano appt**

When Mon Jan 26, 2015 11:30am - 12:30pm Central Time

Where Plano, TX, USA ([map](#))

Calendar Julia Hubbard

Who • Rick Hubbard - organizer

• Julia Hubbard

Going? **Yes** - **Maybe** - **No** [more options »](#)

Invitation from [Google Calendar](#)

You are receiving this email at the account [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) because you are subscribed for invitations on calendar Julia Hubbard.

To stop receiving these emails, please log in to <https://www.google.com/calendar> and change your notification settings for this calendar.



----- Forwarded message -----

From: Rick Hubbard <[rickhubbard@gmail.com](mailto:rickhubbard@gmail.com)>

Date: Sat, Feb 4, 2017, 6:45 PM

Subject: Invitation: Dr shah @ Thu Mar 16, 2017 8:45am - 9:45am (Julia Hubbard)

To: <[julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com)>

Manage all your calendars in one place.

Download the Google Calendar app.

[more details »](#)

Dr shah

When Thu Mar 16, 2017 8:45am – 9:45am Central Time

Where The Minimally Invasive Spine Institute 10400 N Central Expy, Dallas, TX 75231-2297, United States ([map](#))

Calendar Julia Hubbard

Who

- Rick Hubbard - organizer
- Julia Hubbard

Going? [Yes](#) - [Maybe](#) - [No](#) [more options »](#)

Invitation from [Google Calendar](#)

You are receiving this email at the account [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) because you are subscribed for invitations on calendar Julia Hubbard.

To stop receiving these emails, please log in to <https://www.google.com/calendar/> and change your notification settings for this calendar.

Forwarding this invitation could allow any recipient to modify your RSVP response. [Learn More](#)

### *The Fixer Defendants*

154. In addition to Defendants Rick, Dr. Eller, and the Medical Doctor Defendants, the next step in the development of the Venture was the employment of those to keep the Venture going, including people to fix problems as they came up. These roles were filled by the Fixer Defendants: Kurt Knewitz and Texas Ranger Cody Mitchell.

155. The Fixer Defendants operated to keep Hubbard and the Venture's other victims in line, including by way of threatening misuse of legal process.

156. Knewitz and Mitchell were old friends of Rick's dating back at least to college (according to Rick, Mitchell and Rick had been friends since childhood), when they would participate in sex parties together.

157. Defendant Knewitz, as discussed above, acted as a recruiter and reassuring presence, acting as a "good cop." He maintained a relationship with Hubbard in order to encourage her to seek his counsel when she became troubled by Rick's behavior. Then whenever Hubbard did speak with Knewitz to express concerns about Rick, Knewitz would convince her to stay with Rick.

158. Defendant Texas Ranger Mitchell served as the literal bad cop. He was a member of the elite and highly respected Texas Rangers Division,



1 where he in fact specialized in investigating human trafficking and child  
2 exploitation cases.

3 159. Even among the Texas Rangers, Mitchell was high-profile—he  
4 was well known and, in 2020, was even featured in a Showtime mini-series  
5 about one of his cases, called *Outcry*.

6 160. Rick made use of Mitchell early on to intimidate Hubbard—Rick  
7 told Hubbard that Mitchell had done research and that her former husband,  
8 Shawn Mayer, had been under “investigation” by the Texas Rangers for  
9 child exploitation.

10 161. Rick used this to isolate Hubbard, and he even forced Hubbard  
11 to take a polygraph test to “prove” that Mayer had abused her and make  
12 her more dependent on Rick.

13 162. Rick also sought, with the help of Mitchell, to report abuse in  
14 order to take custody of Hubbard’s children with Mayer away from him in  
15 order to better control Hubbard.

16 163. All of this made Mitchell an imposing threat. When Hubbard  
17 seemed like she may not obey Rick’s demands, Rick would tell Hubbard  
18 that Mitchell could cause her to be arrested. Rick also repeatedly told  
19 Hubbard that if she did attempt to contact law enforcement, a call from  
20 Mitchell (as well as Eller) would quickly cause the police to disregard  
21 whatever Hubbard said.

#### 22 *The Investor Defendants*

23 164. Now that Rick and Eller had secured their essential means to  
24 control Hubbard and Goedinghaus, the next step was to secure funding.

25 165. Here too, Rick was adept at seizing opportunities. In 2009,  
26 shortly after meeting Hubbard, he learned that Hubbard was friends with  
27 Defendant Trammell Crow, the son of a prominent Dallas real estate family.

166. The Forced Sex Parties and related events that the Investor Defendants attended were so important to Rick that he would habitually send Hubbard calendar alerts in order to better organize the Venture. For example:

----- Forwarded message -----

From: Rick Hubbard <[rickhubbard@gmail.com](mailto:rickhubbard@gmail.com)>  
 Date: Thu, Feb 19, 2015, 1:47 PM  
 Subject: Updated Invitation: Texas Land & Cattle @ Thu Feb 19, 2015 5:30pm - 7pm (Julia Hubbard)  
 To: [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) <[julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com)>

This event has been changed.

[more details »](#)

**Texas Land & Cattle**

Julia invited if Nanny will babysit kids!

Investing seminar-Possible link to investors for IBMarketing-Networking.

When **Changed:** Thu Feb 19, 2015 5:30pm - 7pm Central Time

Where Texas Land & Cattle Steak House, 812 South Central Expressway, Richardson, TX 75080, United States ([map](#))

Calendar Julia Hubbard

Who

- Rick Hubbard - organizer
- Julia Hubbard

Going? [Yes](#) - [Maybe](#) - [No](#) [more options »](#)

Invitation from [Google Calendar](#)

You are receiving this email at the account [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) because you are subscribed for updated invitations on calendar Julia Hubbard.

To stop receiving these emails, please log in to <https://www.google.com/calendar/> and change your notification settings for this calendar.

----- Forwarded message -----

From: Rick Hubbard <[rickhubbard@gmail.com](mailto:rickhubbard@gmail.com)>  
 Date: Wed, Jul 9, 2014 at 5:08 PM  
 Subject: Updated invitation: Trammell crow Sierra club @ Wed Jul 9, 2014 5:30pm - 7:30pm (Julia Hubbard)  
 To: [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) <[julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com)>

This event has been changed.

[more details »](#)

**Trammell crow Sierra club**

When **Changed:** Wed Jul 9, 2014 5:30pm - 7:30pm Central Time

Where Rel off 635 ([map](#))

Calendar Julia Hubbard

Who

- Rick Hubbard - organizer
- Julia Hubbard

Going? [Yes](#) - [Maybe](#) - [No](#) [more options »](#)

Invitation from [Google Calendar](#)

You are receiving this email at the account [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) because you are subscribed for updated invitations on calendar Julia Hubbard.

To stop receiving these notifications, please log in to <https://www.google.com/calendar/> and change your notification settings for this calendar.

### *Defendant Trammell Crow*

167. As Rick knew, Hubbard had met Crow in 2009 while she was working as a waitress at Plush Nightclub in Dallas.

168. Hubbard and Crow then became friends, with Crow inviting Hubbard to charity events and Hubbard in turn inviting Crow to modeling shows.

169. Rick met Crow at one of these modeling shows in 2009, and later made efforts to ingratiate himself to Crow for his own advantage.

170. As Rick knew, Crow was wealthy and closely connected to Dallas business interests.

1           171. The Crow family company, Crow Holdings, currently boasts  
2 \$27 billion in assets under management, and was involved with the  
3 development of a number of iconic buildings thorough the United States,  
4 including the Embarcadero Center in San Francisco and the Peachtree  
5 Center in Atlanta.

6           172. Defendant Crow himself was more involved in other endeavors,  
7 focusing on environmental philanthropy. Crow is currently on the board of  
8 ConservAmerica and is involved with a range of other environmental  
9 nonprofits including the Texas Conservation Alliance, the Nature  
10 Conservancy of Texas, Texans for Public Lands, and the League of  
11 Conservation Voters. Crow also serves as president of the Crow Family  
12 Foundation, which in 2020 disbursed more than \$45 million in charitable  
13 funding.

14           173. Crow also hosted various parties and social events, which were  
15 much-desired invitations, particularly for those who wished to rise in the  
16 ranks of the Dallas business community, as proximity to Crow and his  
17 guests could open many doors. Crow would even sometimes allow Rick to  
18 stay at Crow's home after the party.

19           174. For instance, Crow hosted a twice-annual camping event, in the  
20 fall and spring each year, called "Kiddie Campout" for fathers and their  
21 children. This event was so exclusive and well-known, requiring a personal  
22 invitation from Crow, that telling local businessmen that you went to the  
23 event would instantly confer credibility. This credibility benefit was  
24 especially pronounced for someone like Rick (who became an annual guest  
25 at the camp out due to the Venture), who otherwise lacked the markers of  
26 being an insider in this community.

175. This camp out was so important to Rick that he would send Hubbard calendar alerts for the date:

----- Forwarded message -----  
 From: Rick Hubbard <[rickhubbard@gmail.com](mailto:rickhubbard@gmail.com)>  
 Date: Mon, Mar 2, 2015, 2:45 PM  
 Subject: Invitation: Kiddie Campout @ Fri Apr 10 12pm - Mon Apr 13, 2015 3pm (Julia Hubbard)  
 To: [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) <[julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com)>

[more details »](#)  
**Kiddie Campout**  
 When Fri Apr 10 12pm – Mon Apr 13, 2015 3pm Central Time  
 Calendar Julia Hubbard  
 Who  
 • Rick Hubbard - organizer  
 • Julia Hubbard

Going? **Yes** - Maybe - No [more options »](#)

Invitation from [Google Calendar](#)

You are receiving this email at the account [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com) because you are subscribed for invitations on calendar Julia Hubbard.

To stop receiving these emails, please log in to <https://www.google.com/calendar/> and change your notification settings for this calendar.

176. Crow's main project is EarthX, formerly called Earth Day Texas, which operates an annual expo showcasing environmental initiatives each year in April.

177. The annual EarthX expo is highly prominent. In 2018, a local Dallas magazine reported that the event included hundreds of vendors, thousands of visitors, dozens of politicians, and "some of the most prominent environmentalists on the planet," including the Secretary of Energy and Lieutenant Governor of Texas. The same article described Crow as a "power broker in the environmentalist movement."

178. Due to the large amount of work that Crow put into the EarthX expo, afterwards he would always be looking to blow off steam and hosted a private afterparty each year. This event would eventually become one of the most lucrative, in terms of development business relationships, Forced Sex Parties each year for the Venture, as it consisted of high-profile individuals looking to indulge themselves in a discreet environment – even its existence was considered secret.

179. The lifestyle of Crow and his friends was ideal for the Venture. Crow and his friends enjoyed recreational sex and drug use, and had money

1 and connections, but needed to keep such activities discreet due to their  
2 local prominence.

3 180. Crow was also very used to getting his way and having vices  
4 delivered to him—he had staff fill contains of cocaine (his favorite drug) in  
5 his home, and once told Hubbard that he had never even been to a liquor  
6 store, as he had always had liquor delivered.

7 181. Crow could be violent, impulsive, and reckless. On one  
8 occasion, he had a violent confrontation with one of his girlfriends that  
9 caused her to lose several teeth.

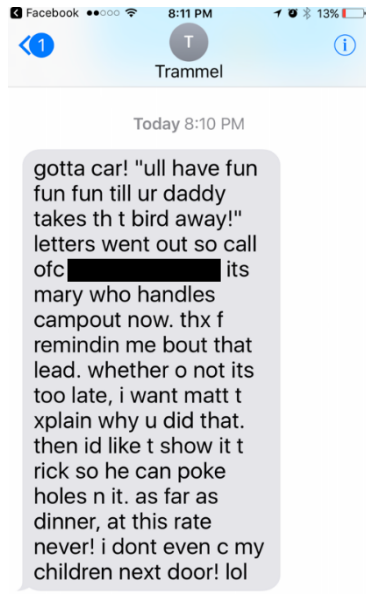
10 182. Crow maintained what he called “lingerie rooms” in each  
11 property he owned in which he kept a variety of lingerie for female guests  
12 to wear, as well as what he called “stripper shoes.” Crow kept a range of  
13 sizes of such shoes, from size 4.5 at the smallest to size 9 at the largest  
14 (because, as Crow also explained to Hubbard, he did not want to be with a  
15 woman who had feet larger than a size 9). Crow even bought lingerie  
16 specifically in Hubbard’s size for her to wear that he kept in his Dallas home,  
17 at Rick’s urging.

18 183. Crow also maintained “gift rooms,” in which he kept gifts for  
19 his guests, but especially female guests. These gifts prominently included  
20 children’s gifts, intended for women with children—as Crow confided to  
21 Hubbard, he particularly favored having sex with women with children, so  
22 he sought to entice them. This also served Rick well, as he preferred to traffic  
23 women who had young children—including first Plaintiff Hubbard then  
24 Plaintiff Goedinghaus—as he could control them by threats of loss of  
25 custody.

26 184. Crow also maintained a “stripper pole” in his personal  
27 bathroom, which was typically off-limits to guests but that he allowed  
28 Goedinghaus to photograph herself with.

185. Hubbard told Crow that Rick was forcing her to perform sex acts and forcing them to take drugs to force such acts. However, Crow had grown to enjoy Rick's services and took no action to either help Hubbard or stop doing business with Rick and the Venture.

186. Crow was sufficiently involved in the Venture that he would often send text messages with Hubbard, or allow himself to be photographed with her:



187. Rick, for his part, was eager to capitalize on Crow's success, including writing letters to ask for money, and even receiving information from Crow's accountant on how to best structure loans to the Venture.



**Integrity Based Marketing**  
 www.IntegrityBasedMarketing.com  
 Phone: 469-215-7355 Fax: 866-753-6330  
 14613 Kelmiscot Drive Frisco, TX 75035

Trammell S. Crow  
 3526 Arrowhead Drive  
 Dallas, TX 75204

Dear Trammell,

I'm embarrassed to strain our relationship by asking you for financial assistance, but as they say...Desperate times call for desperate measures. I'm scared that my children are in danger and they need more help than I can provide on my own.

I spoke with Tom Raggio and he is confident that one of his partner attorneys Barbara VanDuyne can help us tremendously in this matter. He also told me that he didn't know of any other less expensive young attorneys who could adequately handle our case.

I offered to pay their firm \$5,000/month for as long as needed. He replied that most of their efforts would be needed in the first 30 days so he said that he would have to insist on a min. \$20,000 retainer and that he believed the total costs for all litigation would be in the \$25,000 to \$40,000 range.

I need your help and I have three brief offers I would like you to consider today with the ultimate goal of having you pay and/or lend me \$25,000 dollars:

----- Forwarded message -----

From: Rick Hubbard <[rickhubbard@gmail.com](mailto:rickhubbard@gmail.com)>  
 Date: Tue, Sep 9, 2014 at 1:59 PM  
 Subject: Notes for Trammell  
 To: Jon Parsons <[jon@vmdtech.net](mailto:jon@vmdtech.net)>

Papa,

Phil Ecob and Trammell's accountant's ok'd the stock(notes) transfer to Trammell. The gesture was very well received by all and I believe it will go a very long way towards firming up our family friendship and any business relationship with the Crow's in the future. Trammell was admittedly getting frustrated that we had not repaid the loan yet, so it's good timing and an honorable gesture. Thanks for your help with this.

The accountant (Gale Bennett) said this:

*"As discussed yesterday, Trammell would take this gift with carryover basis from Mr. Hubbard + he can increase his basis for part of any gift tax paid on the gift (meaning for purposes of determining gain or loss on disposition he has the same cost basis as Mr. Hubbard - no step up to FMV is allowed for a gift). The main downside to Trammell is that he will pay income tax on the built-in-gain (if any) in the property when he sells the property. Since he is not out any money, that may not be a big deal, but did want to point it out."*

I originally told Phil and Trammell that the Fair Market Value(FMV) was \$68/share, but since I am technically giving away 200 of my shares, I guess the cost-basis would be \$34/share. Not sure about this detail, but my understanding is that all the equity I've been working for has been valued at \$34/share (same as Adwise, Jim, Simon, etc.). That being said, we owe Trammell \$13k-\$15K, so I wanted the value of the gift to be around that amount (200X\$68=\$13,600.00). We can discuss later if you want to iron out details, but I think the value needs to match whatever value you're going to assign the notes you are going to pay me with. You can decide and let me know, but the gift should be minimum of 200 notes as we discussed.

Please assign the notes to Trammell S. Crow and email signed notes to the following email addresses:



190. These men were not just customers, they were also often investors in Rick's string of fraudulent businesses. These investments were a quid pro quo for the men to gain access to Rick's trafficking venture, and each of these men had either actual knowledge of or recklessly disregarded the fact that Rick was forcing Hubbard and Goedinghaus to engage in commercial sex, often because Hubbard or Goedinghaus had directly told them. The Investor Defendants also gave Rick and the Venture credibility: Rick would use their names and reputations to recruit others into the Venture.

191. Defendant Brunson is a sculptor and licensed builder, and owner of Luna Pietra LLC. He also supported his lifestyle through the sale of drugs.

193. In April or May 2019, Rick informed Goedinghaus that she needed to “convince” Brunson to make a substantial investment in the Venture through Rick’s company EcoLoft Homes LLC.

195. In response to this threat, Goedinghaus had sex with Brunson as Rick demanded, and in exchange, Brunson gave Rick \$27,000 in cash in exchange for such commercial sex.

196. Defendant Cain is a prominent film producer, whose work has won the Sundance Film Festival Special Jury Prize and has produced more than twenty films for HBO and Showtime.

198. At these Forced Sex Parties, Rick would force Hubbard to perform sex acts in front of Cain, while Cain had sex with other women at the parties.

200. Cain was so close to the Venture that he would even wish Hubbard a happy birthday on Facebook. Such a message had a dark undertone, since Rick would as a rule force Hubbard (and later Plaintiff Goedinghaus) to attend Forced Sex Parties on her birthday:

----- Forwarded message -----

From: Facebook <[notification+kawsgqna@facebookmail.com](mailto:notification+kawsgqna@facebookmail.com)>  
 Date: Mon, Sep 8, 2014 at 6:31 PM  
 Subject: Michael Cain mentioned you on Facebook  
 To: Julia Hubbard <[julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com)>

facebook



**Michael Cain mentioned you in a comment.**

Michael wrote: "Happy Birthday [Julia Hubbard](#)! I hope that you and Rick have a fantastic celebration!"

Reply to this email to comment on this photo.

[See Comment](#)

This message was sent to [julia.a.hubbard@gmail.com](mailto:julia.a.hubbard@gmail.com). If you don't want to receive these emails from Facebook in the future, please [unsubscribe](#).  
 Facebook, Inc., Attention: Department 415, PO Box 10005, Palo Alto, CA 94303

### *Defendant H.J. Cole*

201. Founder of Dallas real estate brokerage H.J. Cole & Associates, Defendant Cole bragged to Hubbard that he had worked for years as a drug dealer to further support his lifestyle.

202. One of Crow's closest friends, Cole would supply cocaine to Crow, both for Crow's Forced Sex Parties and personal use.

203. Cole also served as Rick's backup when Crow was busy or out of town and Rick desired to attend a Forced Sex Parties, Rick would then force Hubbard to go to Cole's home, where he would force Hubbard to perform sex acts, including sex with Cole.

204. On one occasion, Rick forced Hubbard to take a naked photo in Cole's home to send to Crow when Crow was unavailable to show that Rick and Hubbard were waiting for him. This was intended as an enticement to Crow to further associate with the Venture.

### *Defendant Philip Ecob*

205. Defendant Ecob, president of hedge fund Twynym Capital, previously worked at Crow Holdings Capital for more than 14 years and during all relevant times, until 2021.



1 Juracek was well compensated, in part to maintain his silence concerning  
2 the Forced Sex Parties.

3 *Defendant Paul Pendergrass*

4 213. Defendant Pendergrass is a real estate investor and owner of  
5 investment company P<sup>3</sup> LLC.

6 214. Pendergrass supported the Venture by investing at least  
7 \$250,000 in the Venture, paid by wire transfer, through Rick's company  
8 EcoLoft Homes LLC, with knowledge of the trafficking events that were  
9 occurring.

10 215. Pendergrass also provided further funds to the Venture once  
11 Hubbard fled the Venture, to support Rick's effort to locate Hubbard.

12 216. Pendergrass witnessed numerous Forced Sex Parties and met  
13 Rick and Goedinghaus at various AirBnBs in Summer 2019; then continuing  
14 in Summer 2019 at 501 Havana Street Austin, Texas. He would interrupt the  
15 parties, demanding the return of his funds

16 217. In exchange, Rick forced Goedinghaus to perform sex acts in  
17 front of Pendergrass, and repeatedly offered to force Goedinghaus to have  
18 sex with Pendergrass.

19 *Defendant Robert Pruitt*

20 218. Defendant Pruitt is the president of Data Center Equipment &  
21 Support, LLC.

22 219. Pruitt provided financial support to the Venture, often in the  
23 form of paying for expenses at Rick's request, such as Rick's utility bill.

24 220. Pruitt also employed Rick for a time at his company, the only  
25 full-time job the Rick ever held in the 12 years Hubbard or Goedinghaus  
26 knew Rick.

or foreign postal code, and telephone no. Data Center Equipment & Support, LLC 2800 Guilden Drive Plano, TX 750748347 972-881-9009		2016 Form 1099-MISC		Miscellaneous Income	
PAYER'S federal identification number		2 Royalties		4 Federal income tax withheld	
RECIPIENT'S identification number		3 Other income		Copy For Recipient	
[REDACTED]		5 Fishing boat proceeds		6 Medical and health care payments	
RECIPIENT'S name, address, ZIP/postal code & country Richard L Hubbard 6310 Faringdon Lane Rowlett TX 75089		7 Nonemployee compensation \$ 100059.43		8 Substitute payments in lieu of dividends or interest	
Account number (see instructions)		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>		10 Crop insurance proceeds	
FATCA filing requirement <input type="checkbox"/>		11 Excess golden parachute payments		12 Gross proceeds paid to an attorney	
15a Section 409A deferrals		15b Section 409A income		16 State tax withheld	
\$		\$		\$	
Form 1099-MISC (keep for your records)		17 State/Payer's state no.		18 State income	
				\$	

Department of the Treasury - Internal Revenue Service 38-20898

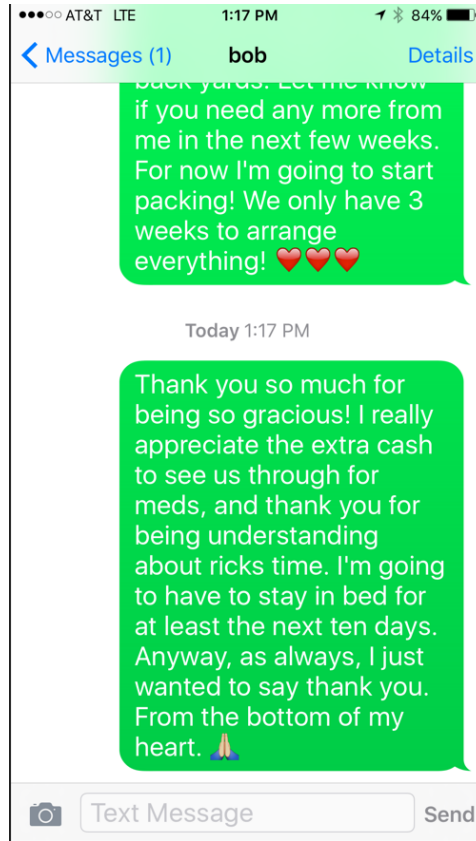
221. In exchange, Rick would regularly send Pruitt naked photos of Hubbard. Pruitt would also tell Hubbard he would fire Rick if Rick did not send such photos.

222. Hubbard would also meet with Pruitt in the 2010-17 time period, and Rick would force Hubbard to sit in Pruitt's lap, while Pruitt would grope Hubbard, smell her hair, and kiss her cheek.

223. Pruitt would refer to himself as "Uncle Bob" to Hubbard and would refer to his meetings with Hubbard as "spending time with Uncle Bob."

224. Rick would force Hubbard to send "thank you" texts to Pruitt after these encounters. For example:





*Defendant Ralph Rogers*

225. Beginning in April 2019, Defendant Rogers allowed Rick and Goedinghaus to live rent-free on his property at 28827 Fine Road, Marble Falls, Texas, once Rick lost his previous home. Rick lives at this property to this day. Rick boasts that this is a “lake house” – in order to lure investors and victims to the Venture – but it is in fact a trailer that is not located on any body of water.

226. In exchange, Rick would host Forced Sex Parties at Rogers’s property, and would force Goedinghaus to “host” the parties while naked or dressed in lingerie.

227. Rick would also distribute naked photos of Hubbard to Rogers and others – and then tell Hubbard that “everyone” had seen her naked.



1           228. Rogers would watch Rick and Goedinghaus have sex at the  
2 Forced Sex Parties, while Rogers would masturbate and grope  
3 Goedinghaus.

4                           *The Venture Involves Shawn and Jade Mayer*

5           229. Defendant Shawn Mayer is the former husband of Hubbard.  
6 While early on in the Venture, Rick and Mitchell made exaggerated  
7 allegations concerning Shawn Mayer, by 2019 Rick had decided that Shawn  
8 Mayer and his new wife Jade Mayer could be useful to the venture.

9           230. Specifically, Rick would provide to Shawn and Jade Mayer cash  
10 payments, hotel rooms, and gifts in exchange for following Rick's  
11 instructions concerning Hubbard's children, including assisting in  
12 withholding Hubbard's children from her and providing them to Rick as  
13 needed to attend an exclusive twice-yearly camping trip with Defendant  
14 Crow. Rick also instructed Shawn Mayer to not contact Hubbard.  
15 Shawn and Jade Mayer complied with Rick's requests despite Hubbard  
16 informing Shawn and Jade Mayer repeatedly by email and phone starting  
17 in or about March 2017 and consistently through 2019 and 2020 that Rick  
18 had sexually assaulted her and caused her to commit commercial sex acts  
19 by means of force.

20           231. On the contrary, Shawn and Jade Mayer were eager to profit  
21 from Rick's payments. On one occasion in Summer 2019 when Rick was  
22 slow in making a promised payment, Shawn Mayer even caused Hubbard's  
23 eldest daughter to ask Rick for money.

24           232. Shawn and Jade Mayer's actions also made more credible Rick's  
25 threats to harm Hubbard's children, including Rick's repeated threats—  
26 starting in 2012—that Rick would kill Hubbard's children to punish her.

27           233. Shawn and Jade Mayer's actions would also later assist the  
28 Venture in forcing Goedinghaus to commit sex acts, as in or around July

1 2019, Rick would be sure to have discussions with Shawn and Jade Mayer  
2 concerning Hubbard's children in Goedinghaus's earshot.

3 234. Rick would then further convey this to Goedinghaus as a threat:  
4 if Goedinghaus did not obey Rick and the Venture, Rick would also take  
5 control of her child away from her as he had successfully done with Shawn  
6 Mayer and Hubbard's children.

7 *Rick Escalates the Venture's Activities*

8 235. Ultimately, Rick founded a series of companies across a variety  
9 of supposed industries—with names such as Integrity Based Marketing,  
10 LLC (registered in Texas in 2013); Storm Fitness Nutrition, LLC (registered  
11 in Texas in 2014); Ultra Combat Nutrition, LLC (registered in Texas in 2014);  
12 EcoLoft Homes LLC (registered in Texas in 2017), and Elevated Wellness  
13 Partners LLC (registered in Texas in 2017), as well as the unassociated entity  
14 Texas Sunrooms and Windows.

15 236. However, none of these "businesses" ever had employees or  
16 actual operations. Instead, they were simply fronts for Rick to process funds  
17 for the Venture, which became his only means of financial support.

18 237. Rick began subtly, not telling Hubbard that sex was being  
19 exchanged for money at sex parties—thus causing Hubbard to engage in  
20 commercial sex acts by means of fraud. Rick would only provide Hubbard  
21 with seizure-stopping medicine if she complied with his requests.

22 238. By 2012, Rick had dropped any pretense of requiring Hubbard's  
23 consent for the Forced Sex Parties and had begun openly assaulting and  
24 threatening Hubbard in order to cause her to attend the Forced Sex Parties  
25 and perform sex acts at them. Rick's behavior further escalated over time,  
26 becoming more violent.

1           239. The methods of force that Rick used included physically beating  
2 Hubbard. These beatings reached such levels that Hubbard suffered a  
3 broken arm, and two separate neck surgeries in 2014 and in 2015 or 2016.

4           240. Before one of these neck surgeries, in 2014, doctors warned  
5 Hubbard that she could have become a quadriplegic from the injuries that  
6 Rick had inflicted.

7           241. Another time, Hubbard needed abdominal surgery for torn  
8 intestinal lining after an injury caused by Rick. On another occasion, in  
9 March 2017, Rick put a gun to Hubbard's head and threaten to kill her.

10           242. Rick would also engage in heavy drug use himself, often with  
11 the drugs prescribed by the Medical Doctor Defendants, and tell stories  
12 about how he fantasized about killing people. This erratic behavior  
13 concerned Hubbard, as it made it more likely that Rick may kill her or harm  
14 her children in a fit of rage if she did not comply with his demands.

15           243. Rick also forced Hubbard to be sterilized on October 29, 2010,  
16 having tubal ligation performed after she gave birth to their child without  
17 her consent. After this, Rick used it as an enticement, telling Hubbard that  
18 if she sufficiently complied with his demands, he might pay to have the  
19 procedure reversed. Rick would also tell Hubbard that she couldn't leave  
20 because no one else would "want [her]" since she could no longer have  
21 children.

22           244. Rick also would drink heavily and force Hubbard to drink  
23 heavily as well, then when intoxicated would record videos of her and use  
24 them to threaten to portray her as an alcoholic to any police and courts as  
25 well as to Hubbard's family and friends, and to other members of the  
26 Venture.

27           245. As time went on, Rick's behavior became even more alarming.  
28 He would tell Hubbard that he was aroused when she cried and talked

1 about his “greatest fantasy” of breaking into people’s homes and raping  
2 them. He also spoke of hiring someone to violently rape Hubbard while he  
3 watched.

4 246. Rick would also talk regularly about building a “bunker,” and  
5 Hubbard would see Google searches on his computers for topics such as  
6 how to bury bodies, further putting Hubbard in fear of Rick’s actions.

7 *Hubbard Leaves Rick and Subsequent Abuse and Labor Trafficking*

8 247. Hubbard left Rick in March 2017 – after one occasion where he  
9 held a gun to her head and threatened to kill her, Hubbard realized that she  
10 must escape Rick.

11 248. However, the scope of the Venture meant that she had not  
12 escaped the Venture. Instead, Rick still unlawfully benefitted from Hubbard  
13 by carrying out labor trafficking through other members of the Venture.

14 249. After leaving Rick, to support herself Hubbard found work in  
15 summer 2017 as a waitress at Silver City Cabaret (the “Cabaret”), a  
16 gentleman’s club in Dallas Texas that was owned by Defendant RCI  
17 Entertainment, Inc. There she met Defendant Case Grover, a manager at the  
18 Cabaret.

19 250. Grover quickly began to display traits similar to Rick, using a  
20 combination of forcing dependency and physical violence to force Hubbard  
21 to do as he wished for his financial benefit. This included forcing Hubbard  
22 to do extra work, including Grover’s managerial duties and for a time  
23 working as a dancer at the Cabaret. Grover then would refuse to disburse  
24 Hubbard’s wages to her.

25 251. Shortly after Hubbard began working at the Cabaret, Grover  
26 began using physical abuse and threats to Hubbard, including repeatedly  
27 threatening her with guns, including an AK-47 which he brought to her  
28 home and fired repeatedly. At one point, in October 2017, Grover beat

Hubbard so badly that he broke her ribs, causing multiple fractures and contusions:

**Follow-up Information (continued)**

Why: As Needed

Contact information

1411 N Beckley Ave

Ste 152

Dallas TX 75203-1586

214-884-4700

**Other info from Your Visit**

**Diagnosis**

Two Posterior rib fractures, multiple rib contusions, left (9,10) initial encounter, Cervical radiculopathy.

**Procedures and Tests Performed During Your Visit**

X-ray Ribs 2 View Left

**Providers Who Cared for You**

Garry F Gagnon, MD

252. Grover would use his power as Hubbard's manager to compel her to follow his demands, threatening to cut her hours or fire her if she did not comply, or did anything without his consent, including small tasks such as grocery shopping alone. Grover also demanded that Hubbard ask permission to use her phone and keep location services turned on so he could track her – if she turned the location services off, Grover would arrive at her home within 20 minutes.

253. Grover also at one point insisted on driving Hubbard's car and intentionally crashed it. Grover then insisted on driving Hubbard to work (and anywhere else she would go) himself.

254. Hubbard reported Grover's behavior to other managers at the Cabaret, including Defendant Molina, the club's waitress manager, and Defendant Butler, the Cabaret's owner. None of them took any action. However, Butler did repeatedly ask Hubbard for sexual favors and threatened to fire her if she did not comply.

1           255. Hubbard learned that Grover was part of the Venture and had  
2       been in regular contact with Rick since Hubbard had begun working at the  
3       Cabaret – in fact, Rick was even in touch with Grover’s wife.

4           256. Indeed, on one occasion in Fall 2017, Rick came to visit Hubbard  
5       and offered to allow her to see her daughter, but only in exchange for all of  
6       the earnings that Hubbard made that day at the Cabaret and on the  
7       condition that Hubbard would have sex with Rick. This request showed that  
8       Rick knew that Grover was himself confiscating Hubbard’s wages, and Rick  
9       knew that such a demand was impossible.

10           *Hubbard Meets Michael Hynes, Jr., Who Further Labor Traffics Hubbard*

11           257. After Grover broke Hubbard’s ribs in October 2017, she left him  
12       and quit her job at the Cabaret. In pain from the broken ribs and still  
13       addicted to some of the drugs that Rick had made her take, Hubbard was  
14       highly vulnerable and even suicidal.

15           258. Around this time, a man named Michael Hynes, Jr., (“Hynes”)  
16       had been messaging Hubbard on Facebook. On December 26, 2017,  
17       Hubbard responded to one of Defendant Hynes’s messages, and Hynes  
18       came to meet Hubbard for a date at her home.

19           259. As Hubbard would only learn later, Hynes was in fact a member  
20       of the Venture. In fact, Hynes had for years been selling the drug GHB to  
21       Fixer Defendant Knewitz, who in turn had supplied the drug to the Forced  
22       Sex Parties that Rick had forced Hubbard to attend.

23           260. Initially, Hynes appeared safe and reassuring. His father,  
24       Michael Hynes, Sr. (“Hynes Sr.”), was a member of the Dallas Fort Worth  
25       Police Department, which led Hubbard to believe that she would be safe.  
26       Hynes also told Hubbard that he was in the military and would occasionally  
27       leave for “special assignments.”



1           261. However, it later became apparent that this was an outlandish  
2 lie or delusion. Hynes had no military experience, and his “special  
3 assignments” in fact were him going on private meth binges, a drug he was  
4 addicted to.

5           262. Over time, Hynes’s delusions became even more disturbing. He  
6 insisted that he had lost his arm in an explosion, and the government had  
7 given him a new arm using “nanotechnology.” Hynes would brag that if he  
8 was injured, the military-grade “nanites” would repair any injury. Hynes  
9 would also regularly compare himself to Superman.

10           263. Hynes also sought to use deceit to make Hubbard addicted to  
11 meth and would give her what he claimed were “steroids” for her injuries.  
12 In fact, he was secretly giving Hubbard meth, a fact she only learned later.

13           264. Hynes concealed his dosing of Hubbard with meth through the  
14 use of what he called “parachuting.” He would empty prescription  
15 medication and replace the contents with meth. Hubbard only learned of  
16 this days before escaping Hynes.

17           *Hubbard Loses Her Home Due to the Venture and Moves in with Hynes*

18           265. In March or April 2018, while still with Hynes, Hubbard’s home  
19 was repossessed due to her heavily strained financial situation. Having  
20 nowhere else to go, Hubbard and Hynes both temporarily moved in with  
21 Hynes’s parents. (A move which, among other things, required Hubbard to  
22 relinquish her service dog, who had become violent with Hynes.)

23           266. Hynes’s behavior continued to grow more erratic. He started to  
24 become jealous, constantly asking Hubbard how many people she had had  
25 sex with and becoming obsessed with the size of his penis, insisting that  
26 Hubbard tell Hynes that his was the largest penis she had ever seen.

27           267. Hynes also insisted he had kicked his addiction to meth, which  
28 was an obvious lie. He would sometimes sneak out to his car to use meth,



1 or would go to hotels, including a local Motel 6 and American Inn, to use  
2 drugs. He would often bring guns to these hotels and shoot them in the  
3 room.

4 268. In summer 2018, Hynes received a settlement for a car accident  
5 he had suffered before meeting Hubbard. Hynes used the money to rent a  
6 home in Hearst, Texas, where Hynes and Hubbard moved into in June or  
7 July 2018.

8 269. At about this time, it became apparent that Hynes was in regular  
9 contact with Rick and would trade information on Hubbard's whereabouts  
10 with him, so that Rick could assist in and benefit from Hynes forcing  
11 Hubbard to sell drugs for his benefit, which constituted labor trafficking.

12 270. At Rick's direction, Hynes also took Hubbard's driver's license  
13 and phone, and took her credit cards, and further forced Hubbard to record  
14 a series of videos apologizing to Rick, which Hynes provided to Rick.

15 271. Hynes's behavior became even more erratic. He would begin to  
16 threaten Hubbard with guns, including holding her at gunpoint and  
17 demanding that Hubbard tell Hynes that she loved him, and that Hynes's  
18 penis was bigger than Rick's.

19 272. Hynes also forced Hubbard to "work" by selling cocaine and  
20 other drugs at various clubs owned by Defendant RCI, called XTC and  
21 Temptations, and Hynes would collect the money.

22 273. In order to force Hubbard to comply with his demands, Hynes  
23 would regularly beat Hubbard, giving her multiple black eyes, choking her  
24 regularly, and holding a gun to her head. Hynes would also throw Hubbard  
25 around the house with such force that it would damage the walls.

26 274. Attempting to escape her situation, Hubbard would regularly  
27 ask Hynes's father, Hynes, Sr., for help, as well as calling the Fort Worth  
28 Police Department. However, Hynes, Sr., insisted that his son could not be

1 doing anything wrong. The Fort Worth Police Department similarly refused  
2 to take any action or even investigate Hubbard's reports, evidently based  
3 on statements from Hynes, Sr., that Hubbard was not credible.

4 275. Hynes, Sr., would also periodically tell Hubbard that if she  
5 continued to accuse his son, he would "call Rick" and Rick would "come  
6 get [her]."

7 276. Hynes's behavior became increasingly extreme, sending  
8 Hubbard to the hospital multiple times. On one visit, Hynes arranged  
9 Hubbard to be drug tested and Hynes or his parents sent the results to Rick,  
10 apparently at Rick's request to use as further leverage to threaten to custody  
11 of Hubbard's children.

12 277. Eventually, in late October or early November 2018, Hynes tied  
13 Hubbard to a bed and kept her restrained for three days, releasing her only  
14 to use the restroom. While tied up, Hynes would smoke methamphetamine  
15 and blow the smoke in Hubbard's face in an attempt to addict her to the  
16 drug.

17 278. In order to prevent her escape, Hynes stabbed Hubbard in her  
18 toes with broken glass so that even if she untied herself while he was gone,  
19 she would have difficulty walking. Hynes then left Hubbard alone. At this  
20 time, Hubbard had no identification, no credit cards, no cash, no food, the  
21 power had been shut off for lack of payment, and no phone, leaving her no  
22 way to seek help.

23 279. Eventually, after three days left alone tied to the bed, Hubbard  
24 was able to attract the attention of construction workers outside. One of the  
25 workers helped Hubbard and brought her a phone. This allowed Hubbard  
26 to call for help and be taken to a hospital for treatment.

*Plaintiff Goedinghaus Meets Rick*

280. Meanwhile, in November 2018, Plaintiff Goedinghaus was going through a difficult divorce.

281. One couple introduced her to Rick. He at first appeared highly charming and Goedinghaus felt as though Rick truly cared for her. He presented himself as a “hero” to her. Rick provided Goedinghaus with a job at his company with less demanding hours so that Goedinghaus could spend more time with her daughter.

282. By December 2018, Goedinghaus had moved in with Rick at 1605 Grayford Drive, Austin, Texas. They shortly thereafter became engaged, although they never married as they were both still married to other people (Hubbard in Rick’s case) at the time. (Later, in April 2019, they would move to Defendant Rogers’s property at 28827 Fine Road, Marble Falls, Texas).

283. After Goedinghaus confided in Rick of past sexual abuse, Rick introduced Goedinghaus to Defendant Eller, whom he claimed was the “best” psychologist, and told Goedinghaus that Eller was the “life coach” of famed motivational speaker Tony Robbins.

284. Goedinghaus began having phone calls with Eller one a week beginning in January or February 2019.

285. Eller first presented himself as a therapist and life coach. However, it gradually became apparent that Eller had an ulterior motive in his role in the Venture, and Eller began insisting that Goedinghaus needed medication and needed to stay with Rick because he provided a highly supportive environment for her.

*The Venture Traffics Goedinghaus*

286. In February 2019, Rick began forcing Goedinghaus to perform sex acts, including with Scott Brunson in Austin, Texas, and then with Ralph Rogers in the summer of 2019 in exchange for Rick to avoid an eviction.

287. Rick would also force Goedinghaus to attend sex clubs, including one called Friends, where he forced Goedinghaus to walk around naked, have public sex with Rick, or a woman that Rick found, while others watched. At one of these parties in Austin, Goedinghaus was forced to have sex with a woman while twenty men watched her and masturbated. Rick further forced Goedinghaus to find women at these parties, who Rick would also force to perform sex acts.

288. Rick would force Goedinghaus to perform these forced commercial sex acts by beatings, choking (on at least twenty-five occasions, often until she was unconscious), threats, and drugs procured by the assistance of Defendants Eller and Miller.

289. At times, after being choked unconscious, Goedinghaus would wake to Rick raping and sodomizing her.

290. Rick would also force Goedinghaus to perform labor, in the form of helping Rick to “run” his fraudulent companies—through this, Goedinghaus quickly realized that Rick’s companies were false fronts for the Venture to receive money.

291. Rick would also tell Goedinghaus disturbing stories, such as fantasies about raping and killing people, and even told Goedinghaus that he had once killed someone. He also would speak of how he wished he had been a Navy SEAL and would sometimes disappear for days without explanation, and claim that he was himself a military contractor and a “mercenary killer” for the United States government. He would often return some mornings covered in dirt and mud. Rick also had a prominent tattoo

1 on his left hand of the Roman numeral III encircled in a ring of stars – the  
2 insignia of the “Three Percenters,” a far-right extremist organization  
3 signifying his connection to the group.

4 292. Rick also told Goedinghaus that he was “turned on” when she  
5 cried and would regularly take large doses of the drug Trimix – which gave  
6 Rick an extreme erection – and then force Goedinghaus to have sex with  
7 him, which he called “sport fucking”. Rick also spoke of hiring someone to  
8 violently rape Goedinghaus while he watched. Rick also occasionally took  
9 GHB, which has similar effects.

10 293. Rick would also use Eller as a threat, both due to his influence  
11 (as a prominent psychologist and his supposed connection to Tony Robbins)  
12 and his control of the drugs prescribed. When Goedinghaus would show  
13 sign of resistance, Rick would withhold drugs. On one occasion, he forced  
14 Goedinghaus into Xanax withdrawal which caused her to have serious  
15 seizures. Rick then forced Hubbard’s daughter (who still lived with Rick at  
16 the time) to hold a belt in Goedinghaus’s mouth to prevent her from biting  
17 her tongue.

18 294. Rick also trafficked Goedinghaus to the Investor Defendants, as  
19 set forth above.

20 295. On one occasion, Rick forced Goedinghaus to attend a Forced  
21 Sex Party at Defendant Crow’s house on July 20, 2019, which was  
22 Goedinghaus’s birthday. Rick instructed Goedinghaus to “seduce” either  
23 Crow or his son, and to “try to get pregnant.” At that party, Rick also forced  
24 Goedinghaus to have sex outside of Crow’s house where Rick would watch,  
25 and when he thought Goedinghaus may not comply he choked her and  
26 threatened her with Crow’s influence.

27 296. Following this Forced Sex Party, Rick and Goedinghaus stayed  
28 in Crow’s guest house for several days.

1           297. On another occasion, in September 2019, Rick severely beat and  
2 choked Goedinghaus before forcing her to attend the bachelor party of Fixer  
3 Defendant Knewitz. This took place at a strip club, where Rick forced  
4 Goedinghaus to perform sex acts with the club's dancers for the enjoyment  
5 of Knewitz, Rick, and other guests.

6           298. Following the bachelor party, while staying in an AirBnB, Rick  
7 again choked Goedinghaus until she was unconscious (in part, for not  
8 finding other women to have sex with him), and Goedinghaus woke up to  
9 see Rick taking off her pants, and Goedinghaus began sobbing.

10           299. After this, Goedinghaus sought to leave the wedding, but  
11 Knewitz, still carrying out his role as fixer for the Venture, convinced  
12 Goedinghaus to stay for the wedding. This time, Goedinghaus was so  
13 reluctant that Rick and Knewitz had to resort to threats of having  
14 Goedinghaus arrested and her child taken away.

15           300. Goedinghaus attended the wedding, but afterwards left Rick.  
16 Goedinghaus escaped to SAFE, a domestic violence shelter, in Austin.

17           301. After leaving, Rick continued to follow Goedinghaus, and  
18 Goedinghaus even found tracking devices in her car.

19           302. However, Goedinghaus contacted law enforcement, and caused  
20 Rick to be arrested on harassment charges while obtaining a lifetime order  
21 of protection against Rick (as Hubbard also later obtained).

### 22           **The Venture Affected Interstate Commerce**

23           303. The Venture relied on the essential work of Defendant Eller,  
24 based in this District in Santa Monica, California, who regularly  
25 communicated with Rick in Texas.

26           304. Eller also submitted false affidavits and testimony to courts in  
27 Texas.

305. Eller also knowingly caused the Medical Doctor Defendants, who resided at relevant times in Texas, to improperly issue controlled substances to the Venture.

306. Such communication, affidavits, testimony, and procurement of procured substances was foundation to the unlawful activities of the Venture.

307. In addition, payments were made to support the Venture and in exchange for its forced commercial sex act via Square, wire transfer, and other electronic means.

308. In addition, the Venture affected interstate commerce because the market for sex workers is national.

### **The Enterprise Engaged in Numerous Unlawful RICO Predicate Acts**

309. The Enterprise, which consisted of all Defendants, committed a number of predicate acts that proximately harmed Plaintiffs.

310. These predicate acts included the following, which are further detailed in the RICO statement filed concurrently with this Complaint.

- **Violation of the Trafficking Victims Protection Act** (18 U.S.C. §§ 1591, 1589): As described herein (*see* paragraphs ¶¶ 5, 8, 9, 13, 15, 17, 18, 21, 26–28, 34, 35, 38, 40, 43, 45–50, 120–126, 132, 134, 136, 139, 141–143, 146, 147, 150, 152, 155–158, 183–185, 187–190, 192–194, 197–199, 201–203, 205–207, 2019–212, 214–217, 220–223, 225, 228, 232–237, 245–247, 249, 251, 254, 258, 264, 267–269, 281–285, 287, 288, 290, 292, 294), all Defendants participated in and benefitted from the Venture and its acts of sex and labor trafficking, in violation of 18 U.S.C. §§ 1591 and 1589.
- **Violation of the Controlled Substances Act** (21 U.S.C. § 801, *et seq.*): As described herein (*see* paragraphs ¶¶ 8, 13, 25, 34, 40, 48, 121, 125, 144, 145, 183, 192, 254, 262, 264, 267), the Enterprise relied



on and profited from the unlawful dealing, use, and distribution of numerous controlled substances, including at least Xanax, Adderall, Oxycodone, cocaine, GHB, MDMA, Vicodin, and Benzodiazepine.

- **Wire Fraud** (18 U.S.C. § 1343): As described herein (*see* paragraphs ¶¶ 8, 14), the Enterprise engaged in a scheme to defraud by means of false statements transmitted by means of interstate wires. Specifically, Defendant Eller engaged in such wire fraud in order to force Plaintiffs to engage in commercial sex acts.
- **Witness Tampering** (18 U.S.C. § 1512): As described herein (*see* paragraphs ¶¶ 12, 20, 158), the Enterprise relied upon threats of physical force in order to hinder, delay, and/or prevent the communication to law enforcement officers information concerning the omission of a federal offense. Specifically, the Venture repeatedly threatened, particularly through the involvement of Defendant Texas Ranger Mitchell, Plaintiffs in order to discourage them from contacting law enforcement regarding the acts of the Venture.

311. These predicate acts proximately harmed Plaintiffs as these acts were essential to the Venture and Enterprise and resulted in Plaintiffs suffering financial harm, including the loss of earnings.

312. These damages include, but are not limited to, moneys that Hubbard and Goedinghaus earned for providing companionship, including at Forced Sex Parties, and moneys that Hubbard earned work at Silver City Cabaret.

313. These predicate acts were committed by Defendants as part of an open-ended continuity Enterprise, where the criminal conduct will be repeated and extend indefinitely, and which will continue to generate a

1 pattern of racketeering activity for the foreseeable future. There exists a  
2 threat of such activity continuing.

3 314. In the alternative, these predicate acts were also committed by  
4 Defendants as part of a closed-ended continuity Enterprise, where the  
5 criminal conduct began in August 2012 and concluded on or around  
6 September 2019—this period, constituting more than five years, was a  
7 substantial period of time, and the enterprise targeted multiple victims.

8 315. The Enterprise had a legitimate non-criminal purpose,  
9 specifically facilitation of entertainment, companionship, and networking at  
10 social functions, which Defendants corrupted to their criminal ends.

11 316. The first predicate act of the Enterprise currently known to  
12 Plaintiffs occurred on or around August 2012.

13 317. The last predicate act of the Enterprise currently known to  
14 Plaintiffs occurred no earlier than September 2019, but Plaintiffs believe that  
15 the Enterprise is continuing.

### 16 CAUSES OF ACTION

#### 17 **COUNT ONE: VIOLATION OF HUMAN TRAFFICKING LAWS, 18**

#### 18 **U.S.C. § 1591(a)**

#### 19 **(SEX TRAFFICKING)**

#### 20 **AGAINST ALL DEFENDANTS**

21 318. Plaintiffs repeat and reallege the allegations made above as if  
22 fully set forth herein.

23 319. Defendants knowingly affected interstate commerce by  
24 recruiting, enticing, harboring, transporting, obtaining, maintaining,  
25 and/or soliciting Plaintiffs and others by any means knowing—or in  
26 reckless disregard of the fact—that Rick and other members of the Venture  
27 would use means of force, threats of force, fraud, and coercion to cause  
28 Plaintiffs and others to engage in commercial sex acts.

**COUNT TWO: VIOLATION OF HUMAN TRAFFICKING LAWS, 18  
U.S.C. § 1589  
(LABOR TRAFFICKING)  
AGAINST ALL DEFENDANTS**

323. Defendants knowingly provided or obtained the labor or services of Plaintiffs by (a) means of force, threats of force, physical restraint, or threats of physical restraint; (b) means of serious harm or threats of serious harm to that person or another person; (c) means of the abuse or threatened abuse of law or legal process; or (d) means of any scheme, plan, or pattern intended to cause Plaintiffs to believe that, if Plaintiffs did not perform such labor or services, Plaintiffs or another person, including Plaintiffs' children, would suffer serious harm or physical restraint.

58

1 or in reckless disregard of the fact that the Venture had engaged in the  
2 providing or obtaining of labor or services by such prohibited means.

3 325. As a direct result of Defendants' violations of 18 U.S.C. § 1589,  
4 Plaintiffs each suffered serious injury and damages in an amount to be  
5 determined at trial.

6 **COUNT THREE: VIOLATION OF RACKETEER INFLUENCED AND**  
7 **CORRUPT ORGANIZATIONS ACT, 18 U.S.C. § 1962(c)**  
8 **(PATTERN OF RACKETEERING)**  
9 **AGAINST ALL DEFENDANTS**

10 326. Plaintiffs repeat and reallege the allegations made above as if  
11 fully set forth herein.

12 327. All Defendants have acted in violation of the Racketeer  
13 Influenced and Corrupt Organizations Act, 18 U.S.C. § 1962(c) to the  
14 detriment of Plaintiffs.

15 328. At all times relevant to these allegations, all Plaintiffs and all  
16 Defendants were "person[s]" within the meaning of 18 U.S.C. § 1961(3).

17 329. Defendants came together to form an association in fact  
18 Enterprise.

19 330. At all times relevant to the above allegations, the Enterprise had  
20 a legitimate non-criminal purpose, specifically facilitation of entertainment,  
21 companionship, and networking at social functions.

22 331. However, this legitimate purpose was subverted by the  
23 Enterprise's illegal acts and violations of federal laws.

24 332. In the case of each Plaintiff, the Enterprise relied on the work of  
25 Eller and other members of the Enterprise in Texas, affecting interstate  
26 commerce.

27 333. Defendants engaged in activities which constitute "racketeering  
28 activity," including violation of the Trafficking Victims Protection Act (18

1 U.S.C. §§ 1591, 1589), violation of the Controlled Substances Act (21 U.S.C.  
2 § 801, et seq.), wire fraud (18 U.S.C. § 1343), and witness tampering (18  
3 U.S.C. § 1512), within the meaning of 18 U.S.C. § 1961(1).

4 334. Defendants engaged in multiple predicate acts amounting to a  
5 “pattern of racketeering activity” within the meaning of 18 U.S.C. § 1961(5).

6 335. Plaintiffs were damaged by Defendants’ violation of 18 U.S.C. §  
7 1962(c) in an amount to be determined at trial.

8 **COUNT FOUR: VIOLATION OF RACKETEER INFLUENCED AND**  
9 **CORRUPT ORGANIZATIONS ACT, 18 U.S.C. § 1962(d)**  
10 **(RICO CONSPIRACY)**

11 **AGAINST ALL DEFENDANTS**

12 336. Plaintiffs repeat and reallege the allegations made above as if  
13 fully set forth herein.

14 337. All Defendants have acted in violation of the Racketeer  
15 Influenced Corrupt Organizations Act, 18 U.S.C. § 1962(d) to the detriment  
16 of Plaintiffs.

17 338. At all times relevant to these allegations, Plaintiffs and all  
18 Defendants were “person[s]” within the meaning of 18 U.S.C. § 1961(3).

19 339. All Defendants conspired to violate the Racketeer Influenced  
20 and Corrupt Organizations Act, 18 U.S.C. § 1962(c) by associating in fact to  
21 create an Enterprise which then engaged in a pattern of racketeering activity  
22 resulting in injury to Plaintiffs.

23 340. The period of the conspiracy began as early as August 2012, and  
24 continued at least until September 2019, and likely is continuing today.

25 341. The object of the conspiracy was to traffic women for purposes  
26 of sexual acts and forced labor, to the financial benefit of Defendant Rick  
27 Hubbard, Defendant Eller, and the Medical Doctor Defendants and for the  
28 sexual gratification and other benefits of all Defendants.

343. The predicate acts caused physical and emotional injury to Plaintiffs, in an amount to be determined at trial.

**WHEREFORE**, Plaintiffs pray that this Court enter judgment against Defendants as follows:

(b) Compensatory damages plus trebling for each Plaintiff for injuries caused by the Enterprise and its individual members;

(d) Imposition of a constructive trust upon all assets associated with the Enterprise;

(f) Cost of suit and attorneys' fees pursuant to Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1964(c);

(g) Attorneys' fees pursuant to the civil remedy for human trafficking in 18 U.S.C. § 1595(a);

(h) Applicable interest on the foregoing amounts; and

(i) Such other and further relief as the Court deems just and proper.

Plaintiffs demand trial by jury on all issues so triable.

November 1, 2022

John G. Balestriere\*